CHAPTER 4.0
PROJECT ALTERNATIVES

This section implements the requirements set forth in State CEQA Guidelines Section 15126.6 regarding analysis of alternatives in EIRs. Section 15126.6 calls for analysis of a range of reasonable alternatives based on the "rule of reason." As applied to selection and analysis of project alternatives, the "rule of reason" means that an EIR need consider only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative. Alternatives should be limited to those that meet most of the basic project objectives and are feasible. The purpose of an alternatives discussion in an EIR is to avoid or minimize environmental effects of the proposed project, and therefore, the alternatives analysis focuses on ways in which environmental effects of the project can be reduced. The discussion of alternatives in this EIR satisfies those requirements. Two areas of significant unavoidable environmental effects were identified for the proposed project: traffic and historical resources.

CEQA also requires consideration of a "No Project" alternative and identification of the environmentally superior alternative from among the project alternatives. If the "No Project" alternative is the environmentally superior alternative, the EIR needs to identify an environmentally superior alternative from among the other alternatives. The discussion of alternatives in this EIR satisfies those requirements.

4.1 Rationale for Alternative Selection

The process for initial development and screening of potential alternatives is described in detail in the Alternatives Screening Report included in *Appendix K* (Alternatives Screening Report), to this EIR. A summary of that analysis is provided below. The screening process began with preliminary identification of a full range of alternatives. Sources used in identifying, defining and developing potential alternatives included:

- Comments received on the Notice of Preparation (*Appendix A*)
- Comments received during public scoping meetings
- Unsolicited proposals by private property owners
- Sites identified by the County Department of General Services
- Program ("no-build") alternatives identified by the County Department of Public Works

As a result, 43 alternatives were identified, which fall into the following general categories (see *Table 4-1* and *Figure 4-1* for regional location):

- Alternative Site Plans - 5 alternatives screened (Alternatives 1 through 5)
- Alternative Locations - Increased and/or Expansion of Existing Detention/Facilities- 10 alternatives screened (Alternatives 6 through 15)
- Alternative Locations – New Sites Identified through Public Scoping, Private Owners, and Department of General Services– 22 alternatives screened (Alternatives 16 through 37)
- Adaptive Reuse of Non-Detention Facilities – 3 alternatives screened (Alternatives 38 through 40)
- No-Build Program Alternatives – 3 alternatives screened (Alternatives 41 through 43)

Once the alternatives were identified and defined, screening criteria were applied to each alternative to determine which were appropriate for further consideration and evaluation in the EIR. The screening criteria were based on the CEQA guidelines Section 15126(a):

> ***An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.***

Using this guideline, the County developed the following criteria:

1) Does the alternative allow the County to meet all, most, or some of the project objectives?
2) Is the alternative feasible from a legal, regulatory and technical perspective?
3) Does the alternative have the ability to avoid or substantially reduce any of the significant effects of the project?

In order to advance to the full analysis in this chapter an alternative would need to meet all three of these criteria. The results of the alternatives screening process are described in detail in *Appendix K*, and are summarized in *Table 4-1* of this EIR. Of the 43 alternatives considered, only six met all three of the CEQA screening criteria outlined above. They are:

1. **Alternative Site Plan** - development of the project away from Magnolia Avenue on a 45-acre site. This alternative became the ***Proposed Project*** analyzed in this EIR (the originally Proposed Project site as discussed in the NOP was oriented east to west with frontage along Magnolia Avenue).

2. **Alternative Site Plan –** development of the project on 16 acres immediately adjacent to the existing LCDF site using a multi-story mid-rise facility. This alternative is analyzed in detail in this section and is referred to as the ***Mid-rise Alternative.***
3. **Alternative Site Plan –** development of the project on 20 acres immediately adjacent to the existing LCDF site. This alternative is analyzed in detail in this section and is referred to as the ***20-acre Alternative.***
4. **Alternative Location – New Sites - Otay Mesa – Rabago Site**. This alternative is analyzed in detail in this section and is referred to as the ***Otay Mesa Alternative***
5. **Alternative Location – New Sites – Camp Elliott near MCAS Miramar**. This alternative is analyzed in detail in this section and is referred to as the ***Camp Elliott Alternative***.
6. **Alternative Location – New Sites – Campo (in vicinity of the County's Juvenile Ranch Facilities (JRF))**. This alternative is analyzed in detail in this section and is referred to as the ***Campo Alternative***.

4.2 Analysis of EIR Alternatives

As noted in Section 15126.6(d) of the CEQA Guidelines, "evaluation of alternatives in an EIR shall include sufficient information about each alternative to allow a meaningful evaluation, analysis and comparison…". Therefore, the technical analyses conducted for the alternatives is not as precise or exhaustive as the analyses conducted for the Proposed Project. However, technical information was researched from various sources in order to provide a reasonable comparison of the alternatives to the Proposed Project. Methodology for collecting and analyzing technical information and data is provided where relevant below, in the discussion of technical issues for each of the alternatives.

4.2.1 Mid-rise Alternative

4.2.1.1 Description and Setting

This alternative was presented in the Alternatives Screening Report (*Appendix K*) as the Reduced Development - New Multi-Story/Mid-rise Detention Facility (16-acre site). This alternative assumes that a new facility would be built on 16 acres of adjacent County-owned land to the east of the existing facility, and then the existing LCDF would be demolished (*Figure 4-2*). Development of a replacement women's detention facility using a multi-story mid-rise facility is designed to use less ground space then proposed for the project. Development would require a four-story facility and approximately 120,000 to 150,000 square feet on approximately eight of the acres, with the remaining eight acres used for recreation, parking, and buffer. This alternative

would accommodate 1,216 female inmates, the same as proposed by the project. The same staff levels would be required as under the Proposed Project.

4.2.1.2 Comparison of the Environmental Effects of the Mid-rise Alternative to the Proposed Project

Significant Environmental Effects of the Proposed Project

***Cultural Resources**:* This alternative would be located on eastern part of the Proposed Project site on County-owned land. For the Proposed Project, significant unmitigable impacts to three historical Edgemoor structures would result. With implementation of the Mid-rise Alternative, at least one of the three historical buildings, the Santa Maria Building, would still be impacted. Avoidance of this impact is not possible with this alternative due to the location of the Santa Maria Building, and site planning needs for the facility. Therefore, while impacts would be reduced when compared to the Proposed Project by avoiding impacts to the Dietary Building and the Rehabilitation Building, significant unmitigable impacts to historical resources would still result with implementation of the Mid-rise Alternative. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Biological Resources: The proposed project would result in three areas of significant impacts to biological resources. The following is a comparison of the 16-acre Mid-rise Alternative relative to each of those impact areas:

- The Proposed Project could result in direct impacts to nesting birds/raptors, and indirect noise impacts to offsite nesting birds due to construction noise. The alternative would result in similar impacts since it would involve construction on 16 acres of undeveloped land.

- The Proposed Project would result in direct impacts to sensitive natural communities (0.6 acre of disturbed coastal sage scrub and 4.8 acres of non-native grassland) and to jurisdictional waters (0.04 acre of unvegetated waters). Development of the Mid-rise Alternative would occur on a smaller footprint (16 acres vs. 45 acres) and would occur on mostly agricultural, developed and disturbed lands, with some impacts to non-native grassland. As such, it would likely avoid the Proposed Project's impacts to coastal sage scrub, and reduce impacts to unvegetated waters and non-native grassland. Therefore, this alternative would result in reduced impacts when compared to the Proposed Project, however, the project impacts would be fully mitigated. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance, since feasible measures to mitigate the project impacts have been identified and would be implemented with the Proposed Project.

- The Proposed Project would have an impact related to a local tree protection ordinance, due to removal of one coast live oak tree. Development at the alternative site would avoid this impact because the tree is located to the west of the alternative site, however, the project impact is mitigated through replacement of the tree. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance, since feasible measures to mitigate the stated project impact have been identified and would be implemented with the Proposed Project.

In summary, the potential for impacts to biological resources would be reduced with the Mid-rise Alternative when compared to the Proposed Project. However, feasible measures to mitigate the stated project impacts have been identified and would be implemented with the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Geology/Soils: Since part of the Proposed Project site would be used for implementation of this alternative, site conditions would be the same and geology and soils impacts resulting from this alternative would be similar. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Hazards and Hazardous Materials*:* Risk of upset during demolition, construction and operation are expected to be similar to those identified for the Proposed Project, as materials used in implementing the alternative and demolition of the existing LCDF would be similar. Also, since part of the Proposed Project site would be used for this alternative, hazardous materials site conditions would be similar and impacts would be similar when compared to the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Hydrology and Water Quality: Similar to the Proposed Project, construction activities for this alternative could result in erosion leading to sediment-laden discharges to nearby water resources. Sediment transport could result in degradation to water quality. Similarly, fuels, oils, lubricants, and other hazardous substances used during construction could be released and impact surface and groundwater. Following the completion of project construction, runoff from impervious surfaces could carry pollutants to drainages both on and offsite.

The release of sediment and other deleterious substances from the project site can be controlled through the use of appropriately selected erosion and sediment control devices, as required by the storm water quality regulations and requirements outlined in Chapter 2.6, similar to those that would be implemented for the Proposed Project. Similar to the Proposed Project, the alternative would require preparation of a Storm Water Pollution Prevention Plan prior to the start of construction. The plan would need to address all of the measures stipulated in the National

Pollutant Discharge Elimination System permit conditions, including site-specific measures and BMPs, implementation schedule, and a monitoring program and reporting requirements.

Similar to the Proposed Project, peak storm water runoff rates would need to be calculated as part of the design and used to determine if existing drainage conveyance facilities would have the capacity and integrity to carry anticipated peak flows and volumes. The Proposed Project's significant impacts would be fully mitigated through the use of LID IMPs, and it is anticipated that impacts resulting from this alternative would likewise be mitigated. Therefore, the alternative does not offer substantial benefits in terms of impact avoidance or reduction.

Transportation/Traffic: The EIR analysis indicates that the Proposed Project would result in traffic impacts that would be significant and not mitigated. No feasible mitigation measures exist to reduce significant impacts to below a level of significance. The Mid-rise Alternative would not avoid the significant impacts of the Proposed Project, since the same number of beds and same staffing levels would be required; therefore, traffic impacts would be similar. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Environmental Effects Found Not To Be Significant for the Proposed Project

As analyzed in *Chapter 3.0* of the EIR, the following effects for the Proposed Project were found to be not significant; aesthetics, agricultural resources, air quality, land use and planning, noise, mineral resources, population and housing, public services, and utilities and service systems.

Aesthetics: The four-story facility would be taller and more visible than the two-story buildings proposed with the project. The four-story facility would also be taller than the proposed commercial buildings associated with the City's Town Center Specific Plan that are planned adjacent to the site. Therefore, this alternative would result in greater aesthetics impacts.

Agriculture: Implementation of the Mid-rise Alternative would result in similar agricultural resource impacts, since the eastern portion of the Proposed Project site, which is currently used for agriculture, would be impacted. Impacts for both the Proposed Project and this alternative would be less than significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Air Quality: Implementation of the Mid-rise Alternative would require demolition of the existing LCDF as well as development of a 16-acre site, and would generate daily trips during operation similar to the Proposed Project. Impacts that would result from the implementation of this alternative are anticipated to be substantially the same as those identified for the Proposed Project. Both the Proposed Project and the alternative would result in less than significant

impacts on air quality. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Land Use and Planning: This alternative site would be located on part of the Proposed Project site and accordingly, it is anticipated that the alternative would result in land use impacts similar to the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Noise: Construction and operational related noise generated by the proposed detention facility under this alternative would be similar to that under the Proposed Project. Noise impacts to sensitive human receptors and sensitive biological resources would be similar since this alternative would be within the same distance to these receptors. The Proposed Project and the Mid-rise Alternative would result in less than significant noise effects. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Population and Housing: Similar to the Proposed Project, the alternative would be designed to meet the projected increase in the female inmate population, and this increase (and any associated increase in staff, etc.) would not foster economic or population growth, or the construction of additional housing. Therefore, neither the Proposed Project nor this alternative would result in significant impacts. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Public Services/Utilities and Service Systems: Implementation of the Mid-rise Alternative would occur on part of the same site as the Proposed Project and would involve the same level of use. The Mid-rise Alternative would therefore result in similar emergency response times and service ratios, similar effects to schools and parks, and similar utility demands. This alternative would also require similar levels of solid waste capacity at regional landfills. Accordingly, public services/utilities and service systems impacts would be similar when compared to the Proposed Project and would be less than significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

4.2.1.3 Relationship to Project Objectives

The Mid-rise Alternative would be able to meet most of the project objectives. Specifically, the alternative would meet the following objectives: 1) correct the deficiencies at the existing LCDF by replacing old structures with modern facilities; 2) meet the projected needs of the County for women offenders to the year 2020 through the development of a 1,216-bed state-of-the-art multi-custody women's detention facility; and 3) allow for a women's detention facility to be built in a location that facilitates the transporting of arrested female offenders/inmates from throughout the

County to the detention facility, court facilities, and other providers such as medical/mental health providers.

However, this alternative would not meet the County's project objective 4. Development of a mid-rise facility would inhibit implementation of the SDSD's inmate management philosophy because it requires a low profile physical layout with clear lines-of-sight. Without clear lines-of-sight, some independent inmate movement would not be permitted and SDSD's "choice and change" management approach that requires an open campus style facility could not be implemented.

The proposed campus-style facility would allow the SDSD to offer programs and services, which are central to its behavioral management philosophy and are a critical part of the County's effort to reduce repeat offending and recidivism. Behavior management for female inmates relies on a rewards system that is based in part on mobility privileges. In order to provide such privileges, and at the same time ensure adequate security, the facility must be designed so that inmates can have some freedom of movement while under efficient visual surveillance. A campus-style facility can be designed to provide the necessary space that is under efficient visual surveillance. In contrast, a standard mid-level jail requires the vertical movement of inmates up and down stairwells or elevators, which cannot be efficiently monitored. A mid-rise facility would require additional deputies to monitor inmates as they get on and off elevators, and would require at least one elevator solely for inmates. Therefore, inmates can be more efficiently monitored in a campus-style facility.

Moreover, the Las Colinas Master Plan (CGL, 2000) provides additional support for the importance of facility layout and design, as noted in the following excerpts from that plan:

> The historical "campus design' reflected by the existing LCDF represents many of the features that are sought in a new facility. Inmates are permitted to circulate to many functions through the open air on tree-lined walkways. Services and programs for all but a minority of the women are centralized which fosters a high degree of social interaction that is generally found to be beneficial to women, especially in the first days of incarceration. For the most part, security is achieved through the presence of trained staff and not barriers and obstacles.
>
> As a campus facility, many of the services, such as dining, commissary, health care, and visitation can be centralized in order that inmates walk across open space to buildings housing these functions. This particular configuration establishes an environment particularly conducive to structured interaction between women offenders. Social-behavioral science research has consistently

> indicated that women offenders have a greater need for personal interaction than their male counterparts. Additionally, correctional data has well documented the correlation between decreased disciplinary incidents and increased constructive contact with staff, visitors, and other inmates. The design of correctional facilities for women can use this reality to operational advantage.

This information further supports the need for an open campus design, as opposed to a mid-rise facility, and demonstrates why the Mid-Rise Alternative would not meet objective 4.

4.2.2 20-Acre Alternative

4.2.2.1 Description and Setting

This alternative was presented in the Alternatives Screening Report (*Appendix K*) as the Reduced Development on 20 acres alternative. This alternative assumes that the existing LCDF would be demolished and a new facility would be built on 20 acres of County-owned land immediately east of the existing LCDF (*Figure 4-3*). This alternative would implement Phase I of the proposed project, but would not construct additional facilities beyond Phase I. The alternative would accommodate 800 female inmates, substantially fewer than the Proposed Project would accommodate. All structures would be one or two stories, and would result in more two-story buildings when compared to the Proposed Project in order to accommodate all the same programs and facilities on a smaller campus.

4.2.2.2 Comparison of the Environmental Effects of the 20-acre Alternative to the Proposed Project

Significant Environmental Effects of the Proposed Project

Cultural Resources*:* This alternative would be located on the eastern part of the Proposed Project site on County-owned land. For the Proposed Project, significant unmitigable impacts to three historical Edgemoor structures would result. With implementation of the 20-acre Alternative, at least one of the three historical buildings, the Santa Maria Building, would still be impacted. Avoidance of this impact is not possible with this alternative due to the location of the Santa Maria Building, and site planning needs for the facility. Configuration of a site that would avoid the Santa Maria Building would require an eastern boundary of the facility that would jog in and out around the building. Such a configuration would result in an infeasible design due to the need for a continuous line of sight around the perimeter of the facility for security reasons. Therefore, while impacts would be reduced when compared to the Proposed Project by avoiding impacts to the Dietary Building and the Rehabilitation Building, significant unmitigable impacts

to historical resources would still result with implementation of the 20-acre Alternative. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Biological Resources: The proposed project would result in three areas of significant impacts to biological resources. The following is a comparison of the 20-acre Alternative relative to each of those impact areas:

- The Proposed Project could result in direct impacts to nesting birds/raptors, and indirect noise impacts to offsite nesting birds due to construction noise. The alternative would result in similar impacts since it would occupy 20 acres of the Proposed Project's site boundary consisting primarily of undeveloped lands.
- The Proposed Project would result in direct impacts to sensitive natural communities (0.6 acre of disturbed coastal sage scrub and 4.8 acres of non-native grassland) and to jurisdictional waters (0.04 acre of unvegetated waters). Development of the alternative would occur on a smaller footprint (20 acres vs. 45 acres) and would occur on mostly agricultural, developed and disturbed lands, with some impacts to non-native grassland. As such, it would likely avoid the Proposed Project's impacts to coastal sage scrub, and reduce impacts to vegetated waters and non-native grassland. Therefore, this alternative would result in reduced impacts when compared to the Proposed Project, however, the project impact would be fully mitigated. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance, since feasible measures to mitigate the stated project impact have been identified and would be implemented with the Proposed Project.
- The Proposed Project would have an impact related to a local tree protection ordinance, due to removal of one coast live oak tree. Development at the alternative site would avoid this impact because the tree is located to the west of the alternative site, however, the project impact is mitigated through replacement of the tree. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance, since feasible measures to mitigate the stated project impact have been identified and would be implemented with the Proposed Project.

In summary, the potential for impacts to biological resources would be reduced with the 20-acre Alternative when compared to the Proposed Project. However, feasible measures to mitigate the project impacts have been identified and would be implemented with the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Geology/Soils: Since part of the Proposed Project site would be used for implementation of this alternative, site conditions would be the same and geology and soils impacts resulting from this alternative would be similar. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

***Hazards and Hazardous Materials**:* Risk of upset during demolition, construction and operation are expected to be similar to those identified for the Proposed Project, as materials used in implementing the alternative and demolition of the existing LCDF would be similar. Also, since part of the Proposed Project site would be used for implementation of this alternative, hazardous materials site conditions would be similar and impacts would be similar when compared to the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Hydrology and Water Quality: Similar to the Proposed Project, construction activities for this alternative could result in erosion leading to sediment-laden discharges to nearby water resources. Sediment transport could result in degradation to water quality. Similarly, fuels, oils, lubricants, and other hazardous substances used during construction could be released and impact surface and groundwater. Following the completion of project construction, runoff from impervious surfaces could carry pollutants to drainages both on and offsite.

The release of sediment and other deleterious substances from the project site can be controlled through the use of appropriately selected erosion and sediment control devices, as required by the regulations similar to those that would be implemented for the Proposed Project. Similar to the Proposed Project, the alternative would require preparation of a Storm Water Pollution Prevention Plan prior to the start of construction. The plan would need to address all of the measures stipulated in the permit conditions, including site-specific measures and BMPs, implementation schedule, and a monitoring program and reporting requirements.

Similar to the Proposed Project, peak storm water runoff rates would need to be calculated as part of the design and used to determine if existing drainage conveyance facilities would have the capacity and integrity to carry anticipated peak flows and volumes. The Proposed Project's significant impacts would be fully mitigated through the use of LID IMPs, and it is anticipated that impacts resulting from this alternative would likewise be mitigated. Therefore, the alternative does not offer substantial benefits in terms of impact avoidance or reduction.

Transportation/Traffic: The EIR analysis indicates that the Proposed Project would result in traffic impacts that would be significant and not mitigated. No feasible mitigation measures have been identified in this EIR to reduce significant impacts to below a level of significance. The 20-acre Alternative would reduce some of the significant impacts of the Proposed Project, since the number of beds would be reduced from 1,216 to 800. However, since the Proposed Project's traffic impacts are cumulative impacts, even small increases in traffic on impacted segments and intersections would trigger a significant impact. As a result, traffic impacts resulting from this alternative would be reduced but would likely still be significant and unmitigated. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Environmental Effects Found Not To Be Significant for the Proposed Project

As analyzed in *Chapter 3.0* of the EIR, the following effects for the Proposed Project were found not to be significant; aesthetics, agricultural resources, air quality, land use and planning, noise, mineral resources, population and housing, public services, and utilities and service systems.

Aesthetics: More two-story buildings would be constructed when compared to the Proposed Project, but as with the Proposed Project, no significant impacts would result. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Agriculture: Implementation of the 20-acre Alternative would result in similar agricultural resource impacts, since the eastern portion of the Proposed Project site, which is currently used for agriculture, would be utilized. Impacts for both the Proposed Project and this alternative would be less than significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Air Quality: Implementation of this alternative would require demolition of the existing LCDF as well as development of a 20-acre site, and would generate daily trips during operation similar to the Proposed Project. Impacts that would result from the implementation of this alternative are anticipated to be substantially the same as those identified for the Proposed Project. Both the Proposed Project and the alternative would result in less than significant impacts on air quality. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Land Use and Planning: This alternative site would be located on part of the Proposed Project site and accordingly, it is anticipated that the alternative would result in land use impacts similar to the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Noise: Construction and operational related noise generated by the proposed detention facility under this alternative would be similar to that under the Proposed Project. Noise impacts to sensitive human receptors and sensitive biological resources would be similar since this alternative would be within the same distance to these receptors. The Proposed Project and the 20-acre Alternative would result in less than significant noise effects. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Population and Housing: The alternative would involve a smaller facility that would have decreased staffing needs. Therefore, the impact of the alternative on population and housing would be slightly less than the Proposed Project. However, neither the Proposed Project, nor this alternative would foster economic or population growth, or require the construction of additional housing, and as a result, neither the Proposed Project nor this alternative would result in

significant impacts. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Public Services/Utilities and Service Systems: Implementation of the 20-acre Alternative would occur on part of the same site as the Proposed Project. The 20-acre Alternative would therefore result in similar emergency response times and service ratios, similar effects to schools and parks, and slightly reduced utility demands. This alternative would require slightly reduced levels of solid waste capacity from regional landfills. Accordingly, public services/utilities and service systems impacts would be similar or slightly reduced and less than significant when compared to the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

4.2.2.3 Relationship to Project Objectives

The 20-acre Alternative would be able to meet project objectives 1, 3, and 4. Specifically, the alternative would meet the following objectives: 1) correct the deficiencies at the existing LCDF by replacing old structures with modern facilities; 2) allow for a women's detention facility to be built in a location that facilitates the transporting of arrested female offenders/inmates from throughout the County to the detention facility, court facilities, and other providers such as medical/mental health providers; and 3) design a women's detention facility that permits the implementation of the SDSD's inmate management philosophy and visitation program, in an effort to reduce repeat offending and recidivism.

This alternative would not meet the County's project objective 2 to meet the projected needs of the County for women offenders to the year 2020 through the development of a 1,216-bed state-of-the-art multi-custody women's detention facility, since it would have only 800 beds.

4.2.3 Otay Mesa Alternative

4.2.3.1 Description and Setting

The Otay Mesa Alternative site is currently privately owned with access provided by Otay Mesa Road, a two-lane roadway. This alternative was developed initially in response to NOP and scoping comments that an alternative location be considered in the Otay Mesa area. Several alternative locations in the Otay Mesa area were identified in the initial stage of alternatives development (see *Table 4-1*), but only this site (the Rabago property) met all of the screening criteria. There are seven existing structures on the site (three residences, four barns/sheds). The remainder of the site is vacant, consisting of non-native grassland and disturbed land, as further described below (SANGIS 2007). The site is located within the County's East Mesa Specific

Plan Area (SPA) and within a Minor Amendment Area of the County's MSCP Subarea. (SANDAG 2005).

Under this alternative, the existing LCDF in Santee would be closed and demolished and a new women's detention facility would be developed on the Otay Mesa Alternative site (see *Figure 4-2*) to accommodate 1,216 female inmates, the same as proposed by the project. Total site requirements under this alternative would be approximately 45 acres, which could be accommodated within the approximately 67-acre total area of this alternative site.

4.2.3.2 Comparison of the Environmental Effects of the Otay Mesa Alternative to the Proposed Project

Significant Environmental Effects of the Proposed Project

***Cultural Resources**:* ASM conducted a review of site records on file at the South Coastal Information Center and reconnaissance level survey of the Otay Mesa Alternative site. The records search indicated that two archaeological sites have been recorded within the property: SDI-10296 and SDI-12872. The former is described as a La Jolla site 50 feet in diameter and is most likely located just outside the property. SDI-12872 is within the project site atop a low knoll in the center of the property. It is recorded as a large prehistoric habitation site with numerous Santiago Peak metavolocanic tools, manos and metates.

A review of the historical maps shows structures within the property on maps dated 1903, 1953 and 1955. These appear to correlate with the locations of some of the existing structures on the property, though all have been remodeled or rebuilt within the last 40 to 50 years.

The site reconnaissance was conducted August 25, 2008 during which time areas deemed of high to moderate potential for cultural resources were examined. The property owner indicated that one of the structures, a small cabin-sized building on raised piers, dated to the turn of the 20th century; this however had been rehabilitated and did not appear to be the original structure, and he stated that the others were more modern. The area mapped as SDI-12872 was surveyed with some intensity and yielded only four artifacts even though surface visibility was excellent. These consisted of one exhausted metavolocanic core, one unifacially retouched flake, one tertiary flake, and a possible mano. No evidence of SDI-10296 was observed.

Based on the results of the record search and reconnaissance, no significant archaeological or cultural resources were found. However, the potential exists for buried cultural resources to be impacted. Therefore, mitigation measures for archaeological resources would be necessary. Impacts to cultural resources would be less with the Otay Mesa Alternative when compared to

the Proposed Project, as a result of avoidance of significant unmitigable impacts to historical resources. This alternative provides a substantial advantage in terms of impact avoidance.

Biological Resources: Biological reconnaissance surveys of the site were conducted in August 2008. The surveys consisted of mapping vegetation communities in and adjacent to the site and preparing inventories of the plant and wildlife species observed. The potential for sensitive plants and wildlife to occur onsite was assessed based upon vegetation communities, soils, and habitat quality onsite and the distribution and range of sensitive species known to occur in the region. The presence of jurisdictional waters onsite and the potential for the site to serve as a wildlife corridor were also evaluated.

Three habitat types are present on the project site: non-native grassland, developed land, and disturbed land. *Table 4-2* provides an approximate acreage for each plant community/land cover. Based on the disturbed and degraded nature of the vegetation communities and the lack of native plant species observed, no sensitive plant species are anticipated to occur on the site.

There is a moderate or high potential for the following sensitive wildlife species to occur in the project area: burrowing owl (*Athene cunnicularia*), grasshopper sparrow (*Ammodramus savannarum*), northern harrier (*Circus cyaneus hudsonius*), and California horned lark (*Eremophila alpestris actia*). The status, habitat requirements, and potential for these species to occur are provided in *Table 4-3.*

The Otay Mesa site is located within the Multiple Species Conservation Program (MSCP) County of San Diego Subarea Plan, within the South County Segment. Therefore, the property would be subject to the County Biological Mitigation Ordinance (BMO; County 1997), and the County Resource Protection Ordinance (County 2007). The South County Segment delineates where habitat will be conserved and where development will occur. Projects approved by the County that are consistent with the Segment do not require additional approval from the Wildlife Agencies. The property is designated a Minor Amendment Area within the South County Segment which means that take of covered species may be authorized only after such an area has become part of the Segment Plan through the appropriate amendment process. Such Minor Amendment properties contain habitat that could be partially or completely eliminated (with appropriate mitigation) without significantly affecting the overall goals of the County's Subarea Plan. Minor amendments under County jurisdiction within the South County Segment require the approval of the Wildlife Agencies.

Mitigation for impacts to habitat on the Otay Mesa site would be required to be consistent with the BMO. Significant impacts would likely result to non-native grassland, a Tier III habitat. Mitigation for impacts to non-native grassland would be required at a 1:1 ratio within East Otay

Mesa (increased ratio is due to current requirements for projects within the Minor Amendment Area on East Otay Mesa).

The proposed project would result in three areas of significant impacts to biological resources. The following is a comparison of the Otay Mesa Alternative site relative to each of those impact areas:

- The Proposed Project could result in direct impacts to nesting birds/raptors, and indirect noise impacts to offsite nesting birds due to construction noise. The alternative site supports numerous ornamental trees in the vicinity of the existing residences and structures. The potential for nesting birds and raptors to occupy those trees is similar to the Proposed Project site, and potential impacts would also be similar.
- The Proposed Project would result in direct impacts to sensitive natural communities (0.6 acre of disturbed coastal sage scrub and 4.8 acres of non-native grassland) and to jurisdictional waters (0.04 acre of unvegetated waters). Development of the project on the Otay Mesa Alternative site has the potential to impact non-native grasslands, developed, and disturbed land. Therefore, development at this site would result in impacts to substantially more non-native grasslands (which cover approximately 94% of the site) when compared to development at the Proposed Project site.
- The Proposed Project would have an impact related to a local tree protection ordinance, due to removal of one coast live oak tree. Development at the alternative site would avoid this impact, however, the project impact is mitigated through replacement of the tree. Therefore, the Otay Mesa Alternative site does not offer a substantial advantage in terms of impact avoidance, since feasible measures to mitigate the stated project impact have been identified and would be implemented with the Proposed Project.

The vegetation communities present on the Otay Mesa Alternative site provide minimal cover for wildlife movement, which suggests the site is not likely a wildlife corridor. As presented above, the Otay Mesa Alternative site is located within a Minor Amendment Area of the County's MSCP Subarea. Properties designated as Minor Amendment Areas contain habitat that could be partially or completely eliminated (with appropriate mitigation) without significantly affecting the overall goals of the County's Subarea Plan. It is not anticipated that impacts to the Otay Mesa Alternative site or the Proposal Project would be in conflict with local policies, ordinances, or adopted plans.

In summary, the potential for impacts of the Otay Mesa Alternative on biological resources would be increased as compared to the Proposed Project, due to removal of non-native grassland over nearly the entire development area of the alternative site.

Geology/Soils: The Otay Mesa Alternative site is relatively level with gentle slopes on the eastern portion of the site. While the site is located in seismically active Southern California, it is not located in any fault zone nor are there any recorded faults transecting the site. The soil within the site consists of Diablo clay, which is gently sloping from 2 to 9 percent. This soil is identified as resulting in slow runoff and has a slight hazard potential for soil erosion. The site is underlain by the Otay Formation, which is composed of well-sorted, poorly indurated massive sandstone and claystone. Differences in geotechnical constraints and the location of geologic hazards would dictate the significance of construction and operational geologic impacts at the Otay Mesa Alternative site. Only site-specific geological evaluation and analysis could predict whether geologic hazards present significant constraints to development. For purposes of the evaluation conducted in this EIR, impacts at the Otay Mesa Alternative site are anticipated to be similar to those resulting from the Proposed Project as no known faults occur onsite and the site is relatively level. The Otay Mesa Alternative site would avoid impacts identified for the Proposed Project relative to fill material and alluvium that may require stabilization. However, the feasible mitigation measures have been identified for these impacts, and therefore the alternative does not provide a substantial advantage in terms of lessening or avoidance of the impact.

According to the California Division of Mines and Geology, Department of Conservation Mineral Land Classification Map, this alternative site is designated as MRZ-3, which is defined as containing mineral deposits the significance of which cannot be evaluated from available data. Therefore, no known mineral resources exist on the Otay Mesa Alternative site and mining activities do not occur in the immediate vicinity (DOC 1982). As under the Proposed Project, the impacts to mineral resources from the implementation of this alternative are anticipated to be less than significant.

Hazards and Hazardous Materials*:* The Otay Mesa Alternative site consists of three single-family residential structures, livestock, barns, sheds, and associated facilities. The age of the existing structures are unknown and may date to pre 1960s for some or all structures located onsite. During an onsite survey, no surface soil staining was observed. According to the California Department of Substance Control Envirostar system (accessed September 29, 2008), the Otay Mesa Alternative Site and its surrounding area are not identified on any federal, state, or local government database listings for cleanup sites or hazardous waste permitted facilities.

Risk of upset during demolition, construction and operation are expected to be similar to those identified for the Proposed Project, as materials used in implementing the alternative and demolition of the existing LCDF would be similar. It is unknown whether hazardous materials exist on the Otay Mesa Alternative site. However, for comparison purposes, the only impacts related to hazards associated with the Proposed Project are those that would potentially result from demolition. This alternative would result in the demolition of the existing structures on the Otay Mesa Alternative Site as well as all of the existing LCDF structures; where as, the proposed project would only result in the demolition of three buildings at LCDF. Implementation of the

project at this location would result in decrease in hazardous waste associated with the livestock that currently roam the site. There are no schools located within a quarter mile of the site. Therefore, aside from demolition-related impacts, the Proposed Project site and the Otay Mesa Alternative site would both have less than significant impacts. The EIR analysis indicates that for the Proposed Project, potentially significant impacts to schools from possible risk of upset can be mitigated to less than significant. Therefore, the alternative does not offer substantial benefits in terms of impact avoidance or reduction.

Hydrology and Water Quality: The Otay Mesa Alternative site is located in the Tijuana Hydrologic Unit (HU) of the California Water Quality Control Board's Region 9 – San Diego, within the Tijuana Valley Hydrologic Area. The Tijuana HU is the northern portion of the Tijuana River watershed. The watershed extends from the peninsular mountain ranges, such as the Cuyamacas, to the Pacific Ocean, just south of San Diego Bay. The majority of the Tijuana watershed is under Mexican jurisdiction, with the cities of Tijuana and Tecate being the largest population centers. Within California, most of the HU is unincorporated portions of the County of San Diego. Within the Tijuana HU, much of the watershed is undeveloped open space (approximately 90 percent), whereas developed land accounts for approximately 6 percent and agriculture occupies approximately 4 percent of the HU (California Regional Water Quality Control Board 2007a). The Tijuana River, which is located within the Tijuana HU, is located approximately 6.5 miles southwest of the project site and is listed as an impaired water body on the 303(d) list of water quality limited segments requiring TMDLs. Known stressors include: eutrophic, indicator bacteria, low dissolved oxygen, pesticides, solids, synthetic organics, trace elements, and trash (California Regional Water Quality Control Board 2007b).

Similar to the Proposed Project, construction activities for this alternative could result in erosion leading to sediment-laden discharges to nearby water resources. Sediment transport could result in degradation to water quality. Similarly, fuels, oils, lubricants, and other hazardous substances used during construction could be released and impact surface and groundwater. Following the completion of project construction, runoff from impervious surfaces could carry pollutants to drainages both on and offsite.

The release of sediment and other deleterious substances from the project site can be controlled through the use of appropriately selected erosion and sediment control devices, as required by the regulations similar to those that would be implemented for the Proposed Project. Similar to the Proposed Project, the alternative would require preparation of a Storm Water Pollution Prevention Plan prior to the start of construction. The plan would need to address all of the measures stipulated in the permit conditions, including site-specific measures and BMPs, implementation schedule, and a monitoring program and reporting requirements.

Similar to the Proposed Project, peak storm water runoff rates would need to be calculated as part of the design and used to determine if existing drainage conveyance facilities would have

the capacity and integrity to carry anticipated peak flows and volumes. The Proposed Project's significant impacts would be fully mitigated through the use of LID IMPs. Therefore, the alternative does not offer substantial benefits in terms of impact avoidance or reduction.

Transportation/Traffic: For the comparative analysis of transportation/traffic, VRPA prepared a Traffic Impact Analysis for the Otay Mesa Alternative, which studied the existing and existing plus project scenarios (VRPA 2008). The EIR analysis indicates that the Proposed Project would result in traffic impacts that would be significant and not mitigated. No feasible mitigation measures have been identified in this EIR to reduce significant impacts to below a level of significance.

Access to the Otay Mesa site would be provided along Otay Mesa Road, an east-west facility classified as a two-lane local collector in the SANDAG San Diego Traffic Forecast (SANDAG 2007). Otay Mesa Road runs east of I-805 to Alta Road (just east of the site). This alternative would result in substantially higher traffic volumes on surrounding roadways compared to the increase in traffic volumes resulting from the Proposed Project. This is due to the fact that the Proposed Project would result in a net increase of only 1,312 trips per day over volumes produced by the existing LCDF, while the alternative would involve construction of an entirely new 1,216-bed facility, which would result in over 2,590 ADT. However, this increase needs to be examined in the context of future operation of these surrounding roadways. Average weekday traffic along Otay Mesa Road east of SR-125 is 6,000 trips with an LOS of A (SANDAG 2007). The Department of Transportation is planning to develop SR-11 and is considering two alternatives. The SR-11 project would consist of a new four-lane freeway along the Otay Mesa Road alignment, from the future SR-905/SR-125 junction traveling east, past the Otay Mesa Alternative site to the future Federal Port of Entry. LOS conditions on the segments of SR-11 to the east and west of the alternative site were studied for the year 2030 and are anticipated to be LOS C and B (VRPA 2007).

Since this alternative would result in the same number of beds (i.e., 1,216 beds) as the proposed project, the same trip generation rate used for the Proposed Project was applied for this analysis. As shown in *Table 4-4, Project Trip Generation,* the relocation and expansion of the LCDF at the Otay Mesa location is expected to generate 2,590 trips. The table also shows a breakdown of the project's estimated peak hour trips.

The project generated vehicle trips were applied to four existing intersections and six street segments in the Otay Mesa Alternative vicinity. Intersection capacity analysis was performed using the Highway Capacity Manual Methodology. The County of San Diego significance criteria were used to determine the significance of impacts. The results of the intersection analysis are shown in *Table 4-5, Summary of Intersection Impacts*.

As shown in the table, the existing and existing plus project scenarios would result in very similar delay times, and the LOS would remain the same. This alternative would not cause an intersection to fall below LOS D operating condition, and therefore the Otay Mesa Alternative site would not result in significant impacts to the study area intersections.

The results of the segment capacity analysis are shown in *Table 4-7, Summary of Roadway Segment Impacts*. As shown in the table, relocation and expansion of the LCDF at the Otay Mesa Alternative site would not cause any significant impacts to the study area roadways.

Given current and anticipated future (2030) operating conditions, implementation of the Otay Mesa Alternative is not anticipated to generate significant impacts to traffic and circulation. Therefore, the Otay Mesa Alternative would avoid significant impacts of the Proposed project since it would result in lesser traffic impacts.

Environmental Effects Found Not To Be Significant for the Proposed Project

As analyzed in *Chapter 3.0* of the EIR, the following effects for the Proposed Project were found to be not significant; aesthetics, agricultural resources, air quality, land use and planning, noise, mineral resources, population and housing, public services, and utilities and service systems. As summarized below, it is anticipated that the implementation of the Otay Mesa Alternative would also not significantly impact these resources.

Aesthetics: The project site is located along Otay Mesa Road, a two-lane east/west roadway. This site currently consists of three single-family residential homes and four barns/sheds. The site is located within the County's East Otay Mesa SPA, Subarea 1 (August 2007). The East Otay Mesa SPA Subarea 1 designates the Otay Mesa Alternative site as technology business park. The character of the surrounding area predominantly consists of vacant land, industrial, and detention/correctional facilities. Just south of Otay Mesa Road is a utility easement through which high voltage power lines and poles extend. The power lines and poles are visible along Otay Mesa Road and from the project site. The San Ysidro Mountains are located to the northeast of the project site. The mountains and foothills are largely undeveloped and include many steep slopes, canyons and peaks.

Under this alternative, the project would be visible from Otay Mesa Road. Implementation of the Otay Mesa Alternative would convert vacant lands to an institutional use visible from three residences and from viewers along Otay Mesa Road. Five detention facilities exist in the vicinity; hence, use of this site would not introduce a visually incompatible land use. Since the site is zoned Specific Plan 88, designated for technology business park, and the area includes industrial uses and detention facilities, the visual impacts are not anticipated to be significant

(assuming incorporation of similar design features as proposed for the project, such as landscaping and project site planning and design).

According to the California Scenic Highway Mapping System, there are no designated State Scenic Highways within the project area (Caltrans 2008). Therefore, potential impacts to these resources would not result. In addition, the East Otay Mesa SPA Subarea 1 does not identify any scenic resources or vistas in the project area. Therefore, significant impacts to designated scenic vistas and resources would not result.

The alternative would involve lighting that would be similar to the Proposed Project, but as with the project, it is anticipated that the lighting could be designed such that significant effects associated with light and glare could be avoided. While the actual aesthetic appearance and context of the alternative are different from the Proposed Project, the impact conclusion relative to aesthetics, including effects on scenic resources, visual character and light and glare, would be similar. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Agriculture: The site currently consists of three single-family homes and four barns/sheds. Livestock currently graze the vacant land within the site boundary. This alternative site and the land surrounding this site is identified as Farmland of Local Importance on the San Diego County Important Farmland Map (DOC 1998). No existing prime farmland, unique farmland, or farmland of statewide importance is currently designated on this site or immediately surrounding this site. The County's East Otay Mesa Specific Plan has designated the Otay Mesa Alternative site and the land surrounding this site for technology business park uses. There are no Williamson Act contract lands located within or adjacent to this alternative site (DOC 2006).

Implementation of the Otay Mesa Alternative would result in the loss of agricultural lands of local importance (DOC 1998). However, since the site is classified as non-active farmland and is planned for development, impacts to agriculture from implementation of this alternative are not likely to be significant, and would be similar to the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Air Quality: The project site is located in the San Diego Air Basin (SDAB). The California Air Resource Board designates those portions of the State where federal or state ambient air quality standards are not met as nonattainment areas. The SDAB is currently in nonattainment for particulate matter (PM_{10} and $PM_{2.5}$), and ozone precursor emissions reactive organic gases (ROG) and NO_x.

Implementation of the Otay Mesa Alternative would require demolition of the existing LCDF and the existing uses at this alternative site, as well as development of a 45-acre site, and would

generate daily trips during operation similar to the Proposed Project (1,216 beds). This alternative would result in slightly greater impacts during the demolition phase of the project due to the need to demolish the entire LCDF and the existing uses at the Otay Mesa Alternative site. However, demolition activities are short-term in nature and would be less than significant. Because the analysis of air quality impacts conducted for the project involved consideration of regional effects related to air quality standards, and because the alternative proposes the same facility (1,216 beds) within the same region, impacts that would result from the implementation of this alternative are anticipated to be substantially the same as those identified for the Proposed Project. Both the Proposed Project and the alternative would result in less than significant impacts on air quality. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Land Use and Planning: The site is located within the County's East Otay Mesa Specific Plan Area (SPA), Subarea 1. The East Otay Mesa SPA Subarea 1 designates the Otay Mesa Alternative site as technology business park.

The character of the surrounding area is predominantly general commercial, industrial, vacant and detention facilities. It is anticipated that development of the project at the Otay Mesa Alternative site would be consistent with relevant planning and regulatory documents. Therefore, similar to the Proposed Project, it is not anticipated that the alternative would result in land use impacts. This alternative does not offer a substantial advantage in terms of impact avoidance.

The site is located within a Minor Amendment Area of the County's MSCP Subarea. Properties designated as Minor Amendment Areas contain habitat that could be partially or completely eliminated (with appropriate mitigation) and must demonstrate conformance or consistency with the overall goals of the County's Subarea Plan. Therefore, the alternative would not result in impacts relative to conflicts with existing habitat conservation planning efforts, similar to the Proposed Project. This alternative does not offer a substantial advantage in terms of impact avoidance.

Noise: The Otay Mesa Alternative site is currently located along Otay Mesa Road, a two-lane road that transverses east and west in the project vicinity. Other existing noise sources in this area occur from the existing livestock at the site, the ongoing construction activities occurring to the east and south of the Otay Mesa Alternative site, and the commercial and industrial uses in the project area.

Construction and operational related noise generated by the proposed detention facility under this alternative would be similar to that under the Proposed Project. Noise impacts to sensitive human receptors at this alternative site would be less than at the Proposed Project site, because development under this alternative would occur on vacant land surrounded primarily by vacant

lands, while development of the Proposed Project would occur in proximity to sensitive receptors (residences and schools). However, the Proposed Project would not result in significant noise impacts to sensitive receptors, therefore the alternative does not represent a substantial advantage in terms of impact reduction. Additionally, as noted in the discussion of biological resources, noise impacts from construction and operation on sensitive species would be greater with this alternative, but would likely be mitigable. Neither the Proposed Project nor the Otay Mesa Alternative would result in significant effects related to noise. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Population and Housing: The Otay Mesa Alternative site contains three single-family residential structures, live stock, barns, sheds, drums and associated facilities. Similar to the Proposed Project, the alternative would be designed to meet the projected increase in the female inmate population, and this increase (and any associated increase in staff, etc.) would not foster economic or population growth, or the construction of additional housing. The alternative site does contain three existing residential units that would be displaced; however, this loss of residences would not be significant on a regional or local level. Therefore, neither the Proposed Project nor the alternative would result in significant impacts on population and housing, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Public Services/Utilities and Service Systems:

Fire Protection: Implementation of the Otay Mesa Alternative would introduce a new land use at the alternative site and would introduce demand for fire protection services that does not currently exist. The alternative site would likely receive fire service from either the City of San Diego Fire Department, with the closest fire station being Fire Station No. 43 located near the intersection of Otay Mesa Road and La Media Road, or from the San Diego Rural Fire Protection District (Fire District) which currently operates out of the Donovan Correctional Facilities on-site fire station. This station is cross-staffed (24/7) with full-time paid firefighters who are employed by the California Department of Corrections and Rehabilitation (CDC&R). In addition, the Fire District with California Department of Forestry and Fire Protection (CAL FIRE), the County of San Diego, and SDSD have established an interim fire station at George Bailey Detention Facility. There is a current need to establish a full-time fire and emergency medical service presence in East Otay Mesa. The Fire District and CAL FIRE are in the process of implementing that service. Depending on the period associated with implementing this additional service, it is likely that this alternative could result in impacts to the Fire District, CDC&R and/or CAL FIRE response times, service levels, and acceptable service ratios. It is likely that the City of San Diego and CAL FIRE would have the ability to maintain current service levels and acceptable service ratios with implementation of the alternative, similar to conditions anticipated with the Proposed Project. However, it is anticipated that similar to the Proposed Project, the alternative would have a less than significant impact to fire protection

services. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Police Protection: The Otay Mesa Alternative would receive security and law enforcement services by SDSD, similar to the Proposed Project. Currently, there are no Sheriff facilities within East Otay Mesa. The nearest station is the Imperial Beach Station located approximately 9.5 miles west of East Otay Mesa. However, the facility would be secured per state-mandated standards. Similar to the Proposed Project, implementation of the alternative would not result in a significant impact to law enforcement facilities. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Schools: There are no existing or planned schools located within the vicinity of the project site. As with the Proposed Project, this alternative would not affect population growth and therefore would not result in a significant impact to school facilities or to existing schools. Therefore, neither the Proposed Project nor the Otay Mesa Alternative would result in a significant impact to schools. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Parks: There are no existing or planned parks within the project area. As with the proposed project, the Otay Mesa Alternative would not increase the use of existing neighborhood or regional parks or other recreational facilities or require construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, neither the Proposed Project nor the alternative would result in a significant impact to parks or other recreational facilities, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Wastewater Treatment: There are existing wastewater conveyance facilities available to serve the Otay Mesa Alternative site. It is likely that some upgrades to the existing facilities would be required, but would likely occur within existing roads and not result in additional environmental effects. Wastewater from the alternative site would be conveyed through facilities operated by the East Otay Mesa Sewer Maintenance District (EOMSMD), and treated by the City of San Diego Metropolitan Wastewater facilities. The City has a sewage transportation agreement with EOMSMD that provides the District with the right to convey 0.33 mgd average flow in the Otay Valley Trunk Sewer and 0.67 mgd average flow in the Otay Mesa Trunk Sewer. EOMSMD's use of wastewater trunk lines and actual growth of the respective drainage basin is limited by the ability of the respective trunk lines and pump stations to handle the sewage flows generated in the service area. While EOMSMD currently has physical capacity in the system, it does not have the capacity to support full buildout of the area. The Otay Mesa Trunk Sewer Master Plan Update and Alignment Study (2003) showed that in order to adequately serve the entire Otay Mesa drainage basin, it would be necessary to construct approximately 14.7 miles of new and

replacement sewer pipeline, and replace the existing pump station 23T. The City of San Diego is currently reviewing three alternative ways to increase the fees associated with developing/improving property within the service area to help pay the increase cost of collecting and treating sewage generated by projects in this area. Payment of the fees would be required to mitigate the Otay Mesa Alternative's potential impacts to wastewater (City of San Diego 2008). Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Water Facilities and Supply: Development of the project would result in demand for water that is similar at a regional level, as the Proposed Project. Although the alternative site would be served by a different water purveyor (the Otay Water District), sources of water supplies would be similar in terms of reliance on imported water. It is anticipated that water supply availability would be similar for the alternative as with the Proposed Project. The alternative site has existing infrastructure for water conveyance, which would likely need improvement, but it is not anticipated that the improvements would result in additional environmental effects. Overall, impacts would be similar to the Proposed Project and less than significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Solid Waste Capacity: Construction of the detention facility at the Otay Mesa Alternative site would still require the demolition of the existing LCDF. As with the Proposed Project, the majority of the material would be either recycled or reused. Operationally, solid waste disposal would be similar to the Proposed Project site, using the same disposal facility (Otay Landfill). The current closure date for the Otay Landfill is estimated to be 2028. Capacity issues would be the same as with the proposed Project, and impacts would be less than significant for both the Proposed Project and the alternative. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

4.2.3.3 Relationship to Project Objectives

The Otay Mesa Alternative would be able to meet project objectives 1 and 2 by providing additional capacity to house female inmates. Specifically, the alternative would meet the following objectives: 1) correct the deficiencies at the existing LCDF by replacing old structures with modern facilities; and 2) meet the projected needs of the County for women offenders to the year 2020 through the development of a 1,216-bed state-of-the-art multi-custody women's detention facility.

However, this alternative would not meet the County's objective 3. Specifically, under this alternative, a women's detention facility would not be built in a location that facilitates the transporting of arrested female offenders/inmates from throughout the County to the detention facility, court facilities, and other providers such as medical and mental health providers.

Constructing the facility at the Otay Mesa site would result in an operational inefficiency related to the booking process. In addition housing inmates who have been sentenced, the existing LCDF also provides onsite booking facilities. As with the existing LCDF, the proposed LCDF project would include an onsite booking facility for SDSD staff, and other police officers and regional agencies in the central part of San Diego County, including the regional agencies that currently use the existing LCDF to book arrestees (see *Section 1.1.3*).

With this alternative, officers transporting females arrested throughout the County would be required to drive to and from the Otay Mesa Alternative site for booking. An onsite booking facility at Otay Mesa would generally increase the amount of time a law enforcement officer would be required to leave his/her beat, due to additional time spent in transit to the Otay Mesa site. The public safety needs of the County are best served when police officers and deputies spend more time patrolling the community and responding to calls for service and less time in transit to book persons taken into custody.

Driving times and vehicle miles traveled by local law enforcement were analyzed based on booking information from the existing LCDF facility in 2007. Approximately 31% of the Sheriff's Department's LCDF bookings (and close to 8% of total LCDF bookings) were logged by deputies patrolling beat areas assigned to the Santee and Lemon Grove commands. Due to chain-of-custody and other property-related procedures, Sheriff's data systems, and the limitations on what work can be performed in the field, deputies usually bring detainees to the Sheriff Station for processing prior to making a trip to a detention facility for booking. All Sheriff's Stations with the sole exception of the Imperial Beach Station (representing 1.7% of total LCDF bookings) are closer to LCDF than to the Otay Mesa Alternative site. As a result, deputies would spend time in transit with a detainee prior to booking and less time getting back on the beat with a women's jail in a Santee location compared to a facility located at the alternative site.

The discrepancy in mileage and travel time between the proposed project and an Otay Mesa alternative is substantial. In 2007, Santee Sheriff Station deputies booked 671 female detainees at LCDF. According to Map Quest, the Santee Sheriff Station is 1 mile from LCDF, and it would take approximately 2 minutes to drive from the station to LCDF. In contrast, the Santee Sheriff Station is 30 miles from the intersection of Otay Mesa and Alta Roads (approximately 2,600 feet from the Otay Mesa Alternative property), and it would take 38 minutes to drive from the station to Otay Mesa. Therefore, the estimated time/mileage savings for Santee deputies that is created by locating LCDF in Santee compared to Otay Mesa is 74 minutes/58 miles per roundtrip, or an estimated 828 hours/38,900 miles per year. Using the same analysis, the estimated comparative time/mileage savings for Sheriff deputies that work at the Lemon Grove Sheriff Station is 32 minutes/26 miles roundtrip, or an estimated 254 hours/12,376 miles for bookings logged in 2007.

Additionally, the operational practices of other law enforcement agencies result in similar comparative results. For example, San Diego Police Department officers, who are responsible for nearly 50% of the total booking activity at Las Colinas, typically process detainees at the Police Department's Headquarters at 1401 Broadway. So, as with the Sheriff's Department, SDPD trips to LCDF do not originate at the location of arrest, but begin at a central location (in this case downtown San Diego), which is estimated to be 6 minutes and 4 miles closer to LCDF than to an Otay Mesa location, or 12 minutes and 8 miles roundtrip. The estimated comparative time/mileage savings for San Diego Police Department for bookings logged in 2007 is 1,300 hours and 55,000 miles.

The San Diego Police Department is considering a change in operational practices that would give officers more discretion to book arrestees directly from the field. This change would decentralize the current process wherein officers bring all offenders to Police Headquarters in Downtown San Diego before taking the offenders to a facility for booking. With the proposed change in practice, trips to the booking facility could originate at a patrol station or from the location of arrest.

This change could result in some SDPD trips being shorter to Otay Mesa than to Santee. However, only one SDPD division – the Southern Division which encompasses San Ysidro, Nestor, and Otay Mesa – would be closer to an Otay Mesa Alternative than to a facility in Santee. Much of the Southeastern Division is geographically equidistant from Santee and Otay Mesa, especially if the SR-125 toll road (South Bay Expressway) is factored into the transportation time. However, San Diego Police Department Order 08-08 prohibits officers from using the toll road except for emergency situations (lights and sirens or officer safety situations), active surveillance operations, and on a limited basis with approval of command.

Table 4-7 shows the number of female arrests by SDPD in each SDPD division in 2007. The arrest data is from the Automated Regional Justice Information System (ARJIS). In 2007 per SDPD's current policy, the arrestees were first taken to Police Headquarters in downtown San Diego for processing before being transported to the Las Colinas facility in Santee for booking. In light of SDPD's possible change in operations, the table also shows travel information (time and distance) from each SDPD division station to the Las Colinas facility in Santee and to an alternative location in Otay Mesa.

Based on the 2007 arrest data and assuming SDPD changes its operations, nearly 86% of SDPD trips for female arrests would originate from a location that is closer to the Las Colinas Detention Facility in Santee than to the Otay Mesa Alternative. Therefore, even if the current SDPD practice changes, a women's facility located in Santee would still reduce the travel time and distance for the SDPD. The configuration of the freeway and highway system in San Diego

County (especially with the improvements to Hwy 52 that are currently underway) is the primary factor contributing to these savings.

It should be noted that the 86% figure is conservative because it assumes that SDPD officers use the South Bay Expressway to transport female offenders from the Southeastern Division to the Las Colinas facility in Santee. If the restriction on using the South Bay Expressway is factored in, the percentage of SDPD trips that are closer to the Las Colinas facility in Santee than to the Otay Mesa Alternative increases to 95%.

Six law enforcement agencies or Sheriff's units whose bookings exceeded 1% of the total LCDF bookings in 2007 could potentially gain efficiency from an Otay Mesa location: Chula Vista PD, Immigration & Customs Enforcement, National City PD, US Customs, Imperial Beach Sheriff's Station, and the Sheriff's Department Courts Services Bureau at South Bay Regional Center. While these agencies or units may see some comparative time and mileage savings (estimated to be 265 hours/ 17,700 miles), they represented only 11% of the total LCDF bookings in 2007. In contrast, agencies whose bookings exceeded 1% of the total bookings and are closer to Santee than to Otay Mesa represented 76% of the total bookings in 2007.

The Sheriff's Department did not calculate and compile booking trip distances in this manner for every agency that uses LCDF because many agencies had fewer than 1% of the total bookings, and not all organizations require officers to bring detainees to a central location prior to departing for the women's jail. California Highway Patrol troopers, for example, are given the discretion to take female detainees directly to the facility and will often do so when arrests occur east of I-15 or closer to the women's jail than to the CHP station at 4902 Pacific Highway in San Diego. However, 13,975 records out of 14,756 (95%) total booking records were analyzed to determine whether a law enforcement transit trip would be closer to LCDF or to an Otay Mesa Alternative. On this basis, and for those agencies whose 2007 time and mileage savings can be estimated, it is reasonable to assume that there could be a net savings for San Diego County law enforcement agencies of 3,400 deputy/officer hours and nearly 152,000 vehicle miles if a new women's detention facility were located in Santee rather than in Otay Mesa. A summary of the analysis is presented in *Table 4-7*.

Associated operational savings were not estimated in this analysis, but these savings in staffing costs, fuel costs and vehicle maintenance (reduced wear-and-tear) should not be discounted. In addition, a Santee site is closer to the majority of the law enforcement agencies that use the facility than a more remote location and is easily accessible via major freeways and roads (the major factors that reduce driving times). Therefore, officer/deputy time 'saved' can be spent back on the beat, reducing response times and improving safety while reducing the need for overtime.

Additionally, medical and mental health providers are not in proximity to the Otay Mesa site. Arrestees and inmates requiring more intensive medical treatment must be transported to UCSD Medical Center in Hillcrest, approximately 27 miles away, or 36 minutes driving time (one way) from Otay Mesa. The distance to support service and criminal justice facilities should be thoughtfully considered when siting a new women's detention facility. As a matter of comparison and based on information obtained from Map Quest, the distances to commonly-used support and justice facilities from the proposed site and an Otay Mesa site are:

Facility	Time/Distance to Proposed Project Site	Time/Distance to Otay Mesa Alternative
COURTS		
Downtown Courthouse	24 minutes 18 miles	30 minutes 23 miles
El Cajon Courthouse	7 minutes 4 miles	28 minutes 22 miles
Vista Courthouse	45 minutes 41 miles	66 minutes 60 miles
South Bay Courthouse	24 minutes 20 miles	21 minutes 15 miles
MEDICAL		
UCSD Medical Center	23 minutes 18 miles	33 minutes 25 miles
Psych Hospital of SD County	23 minutes 19 miles	32 minutes 26 miles
Sharp Grossmont Hospital ER*	9 minutes 7 miles	
Scripps Mercy Hospital ER**		20 minutes 14 miles
*Current ER for LCDF life-threatening emergencies **Current ER for George Bailey Detention Facility & East Mesa Detention Facility life-threatening emergencies		

Of the facilities identified above, only the South Bay Courthouse is closer to the Otay Mesa Alternative site (by 3 minutes and 5 miles) than to the proposed project site. The logical inference is that the Otay Mesa Alternative would result in time and cost increases when compared with the proposed project. This inference is also based in part on the fact that the proximity of courthouses is not the sole factor when determining inmate transportation efficiencies. The Sheriff's Prisoner Transportation detail is housed at the County Operations Center in Kearny Mesa. All bus trips begin and end at this location, where the buses are fueled, maintained and stored. Distances from the Operations Center to the Santee location and the Otay Mesa location are as follows (based on Map Quest):

	Time/Distance to Proposed Project Site	Time/Distance to Otay Mesa Alternative Site
County Operations Center (COC) 5555 Overland Drive, San Diego	17 minutes 11 miles	38 minutes 30 miles

When compared with an Otay Mesa location, the Santee location offers overall savings in drive time and mileage due to the shorter distance between the County Operations Center, the proposed project site, El Cajon Courthouse, the Downtown Courthouse, the Vista Courthouse and health, mental health and emergency medical providers. Furthermore, a relocating a new women's facility to Otay Mesa would make some legs of existing inmate transportation runs prohibitively long, which could result in the need to add an additional morning run (and another bus to the fleet) in order to get the inmates to court on time. Similarly, in the evenings, the delay due to length of run could generate overtime (and added costs) for court deputies staying late with female inmates and overtime for the Transportation Detail deputies to finish the run before returning the bus to Kearny Mesa.

As a further example, an Otay Mesa location would increase certain trips associated with medical examinations. Detainees are assessed by nursing staff when they arrive at the booking facility. If they are referred to UCSD for further medical review prior to booking into the jail, it is the arresting officer's responsibility to transport the female offender to UCSD and wait with her until she is cleared by UCSD medical staff. The officer must then drive her back to LCDF for booking. Currently, these trips are between LCDF and UCSD. If the facility were to be moved to an Otay Mesa location, the added distance to and from UCSD would likely consume the majority or entirety of that officer's shift.

Finally, while North County inmates are typically housed at the Vista Detention Facility, it is important to note that North County inmates (with trials pending at Vista Courthouse) are frequently housed at LCDF because of classification issues (gang conflicts, co-defendant conflicts, etc.) or due to the location of arrest being closer to LCDF. The Sheriff's Department runs a trip between the women's facility and Vista Courthouse twice each day, when that court is in session. If the women's facility were located in Otay Mesa or in another remote location, substantial time would be added to these routes.

The Otay Mesa Alternative would also not effectively meet project objective 4. It would inhibit the implementation of the SDSD's inmate management philosophy and visitation program, which has the objective of reducing repeat offending and recidivism because the Otay Mesa Alternative does not provide convenient access to public transportation services. Public bus transportation is available in Otay Mesa from the MTS bus stop, but it is located approximately 1.1 miles to the southwest of the alternative site. Currently, the pedestrian route between the Otay Mesa alternative site and the bus stop does not have continuous sidewalks or street lighting for safe pedestrian access. No other public transportation is available within the vicinity of the site.

The average number of visitors currently (over a five week period in the summer of 2008) at LCDF is approximately 36 per day on weekdays and 96 per day on weekends. This number is

anticipated to increase with the proposed project, due to additional programs and facilities to encourage increased visitations. Consequently, the proposed project would include a larger visitation center and an expanded visitation program. To implement the visitation program, it is important to maximize public transportation options at the new facility to encourage visitation. Visits with dependent children are especially important to SDSD's inmate management philosophy because they support the rehabilitation of women and reinforce the principles taught in parenting and life skills courses.

4.2.4 Camp Elliott Alternative

4.2.4.1 Description and Setting

This alternative was developed based on comments received during public scoping that an alternative location should be considered on undeveloped land between Scripps Ranch and Poway, in the vicinity of Mission Trails Regional Park, Marine Corps Air Station (MCAS) Miramar and East Elliott. Land use and ownership restrictions within both Mission Trails Regional Park and MCAS Miramar made those lands infeasible for consideration of a detention facility. However, the San Diego Unified School District owns a parcel of land that is surrounded by MCAS Miramar, but is not part of the military base. That site, shown in *Figure 4-3*, is a 58-acre parcel of undeveloped land referred to as "Camp Elliott" and is located on the northern edge of the Tierrasanta Community in the City of San Diego just north of SR-52 and northwest of Mission Trails Regional Park.

Under this alternative, a new multi-custody women's detention facility capable of accommodating 1,216 female inmates would be built on the Camp Elliott site (see *Figure 4-3)* and the LCDF would be closed and demolished. Total site requirements under this alternative would be approximately 45 acres, which could be accommodated in the 58-acre Camp Elliott site.

The site is vacant with hilly terrain. Vegetation communities onsite consist of disturbed habitat, coastal sage scrub and non-native grasslands. Access to the site is currently limited to the dirt and paved road system associated with MCAS Miramar as well as an access road located within the San Diego County Water Authority aqueduct easement, which traverses the northeastern portion of the site. There is no access to the site from public roads. A new public access would need to be constructed from the interchange of SR-52 and Santo Road located approximately 1,800 feet to the southeast of the subject property. Elanus Canyon traverses the southern portion of the site and forms a topographic constraint relative to access to this interchange. There are no sewer, water or energy utilities located on the site.

4.2.4.2 Comparison of the Environmental Effects of the Camp Elliott Alternative to the Proposed Project

Significant Environmental Effects of the Proposed Project

Cultural Resources: Initial analysis has identified a number of archaeological resource sites on the Camp Elliott Alternative site (Southwest Division Naval Facilities Engineering Command 2008Site significance has not been determined for archaeological resources on this alternative site, however it is assumed that any significant impacts could be mitigated to below a level of significance. No known historical resources are located on the Camp Elliott site. No known archaeological sites were identified at the Proposed Project site, but the Proposed Project would result in significant and unmitigable impacts to historical resources. Therefore, the potential to impact significant cultural resources would be less with implementation of this alternative compared to the Proposed Project due to avoidance of impacts to significant historical resources. This alternative provides an advantage in terms of impact avoidance.

Biological Resources: To analyze the comparative impacts to biological resources, a review of SanGIS maps, aerial photographs, and the MSCP database were used to research site conditions and evaluate potential impacts at the alternative site. In addition, a 2002 Environmental Impact Statement prepared by the US Navy was reviewed as it evaluated environmental impacts of developing military housing on an adjacent site on MCAS Miramar (Southwest Division Naval Facilities Engineering Command 2002. The total area that would be impacted at the Camp Elliott Alternative site would be the same as that anticipated at the Proposed Project site (45 acres; not including anticipated off-site improvements associated with access and utilities). However, under this alternative, construction would occur at a new, undeveloped site dominated by sensitive biological resources including Diegan coastal sage scrub (known to be occupied by the coastal California gnatcatcher), Coastal Sage-Scrub chaparral, chamise chaparral, vernal marsh, southern mixed chaparral, disturbed habitat, native grassland, and non-native grassland (Southwest Division Naval Facilities Engineering Command 2008). A potential drainage is present in the northern portion of the site that is under the jurisdiction of the wetland resource agencies. In addition, other sensitive biological resources with potential to occur include vernal pools, special status plants and wildlife (such as willowy monardella, San Diego thornmint, San Diego barrel cactus, and burrowing owl) and suitable nesting/foraging habitat for birds and raptors.

The proposed project would result in three areas of significant impacts to biological resources. The following is a comparison of the Camp Elliott Alternative site to each of those impact areas:

- The Proposed Project could result in direct impacts to nesting birds/raptors, and indirect noise impacts to offsite nesting birds due to construction noise. The Camp Elliott Alternative site is occupied by the California gnatcatcher, and potentially occupied by burrowing owl and nesting birds/raptors, impacts to which (including impacts related to

noise) would be significant. The Camp Elliott Alternative site is within close proximity to areas that are likely occupied by special status species that would require restrictions based on noise from construction. Also, an access road would be required to be constructed for this alternative site, and noise impacts to sensitive bird species (e.g., California gnatcatcher) related to road construction and operation would be greater than under the Proposed Project, due to the adjacent sensitive habitat areas, including areas known to support this noise sensitive bird species. Therefore, the alternative site has the potential for direct and indirect impacts on noise sensitive upland and riparian bird species.

- The Proposed Project would result in direct impacts to sensitive natural communities (0.6 acre of disturbed coastal sage scrub and 4.8 acres of non-native grassland) and to jurisdictional waters (0.04 acre of unvegetated waters). Development of the project on the Camp Elliott Alternative site has the potential to impact coastal sage scrub and other sensitive habitats to a greater degree as compared to the Proposed Project.
- The Proposed Project would have an impact related to a local tree protection Ordinance, due to removal of one coast live oak tree. The project impact is mitigated through replacement of the tree. Development at the alternative site would avoid this impact. The Camp Elliott Alternative site does not offer a substantial advantage in terms of impact avoidance.

The Proposed Project would not significantly impact any special-status plant species. By comparison, the Camp Elliott Alternative site has the potential to support willowy monardella, San Diego thornmint, and San Diego barrel cactus. Therefore, impacts at the Camp Elliott site would be potentially greater.

The site is adjacent to lands designated as Multi-Habitat Planning Area (MHPA) within the City of San Diego Subarea Plan of the MSCP, and is adjacent to MCAS Miramar lands and addressed by the Supplemental Environmental Assessment (SEA) for Military Housing in the San Diego Region (Southwest Division Naval Facilities Engineering Command 2008). It is not anticipated that impacts to the Camp Elliott Alternative site or the Proposed Project would be in conflict with local policies, ordinances, or adopted plans.

Overall, development of the project on the Camp Elliott Alternative site may impact sensitive biological resources including coastal sage scrub, and special status species, if present. It appears likely that the bulk of the required 45 acres for the project would be coastal sage scrub. In contrast, while the Proposed Project would result in the loss of 0.6 acre of disturbed coastal sage scrub, 4.8 acres of non-native grassland, and 0.04 acre of unvegetated waters (sensitive biological resources), the majority of the development (23.6 acres) would occur to urban/developed areas. In summary, impacts to biological resources would be greater under the

Camp Elliott Alternative than under the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Geology/Soils: While only site-specific geological evaluation and analysis could predict whether geologic hazards present significant constraints to development, given that the project site is marked by hilly terrain with significant slopes, more grading would be required at this site than at the Proposed Project site. The site is underlain by the Mission Valley formation, making the ground landslide prone due to an overwhelming presence of weak sandstone (Southwest Division Naval Facilities Engineering Command 2002). While it is anticipated that these impacts could be mitigated to less than significant, overall, geological impacts of this alternative are anticipated to be greater than would occur under the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

No known mineral resources exist onsite (DOC 1982) and mining activities do not occur in the immediate vicinity. Impacts to mineral resources resulting from implementation of this alternative and the proposed project are anticipated to be less than significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Hazards and Hazardous Materials: Risk of upset due to demolition of the existing LCDF and operation are expected to be similar to those identified for the Proposed Project, as materials used to operate the facility at an alternative site would be similar. However, risk of releasing existing hazardous materials during construction would be greater with implementation of the Camp Elliott Alternative. The MCAS Integrated Natural Resource Management Plan identifies areas surrounding the site as "Ordnance Hazard Potentially and/or Confirmed to be Present" (Southwest Division Naval Facilities Engineering Command 2002). Hazardous waste contamination in the form of "potential hazardous munitions residue from unexploded ordinance" was identified immediately adjacent to the northwest boundary of the site (Southwest Division Naval Facilities Engineering Command 2002), and it is likely that the same hazardous material is present on the alternative site. Additionally, because the site is adjacent to MCAS Miramar, it is located within an Accident Potential Zone (San Diego County Regional Airport Authority 2004), which is identified as an area likely to be affected if an aircraft crash were to occur. Therefore, overall, hazards impacts of this alternative are greater than would occur under the Proposed Project, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Hydrology and Water Quality: This alternative site is located within the San Diego Hydrographic Unit, within the Santee and Mission San Diego Hydrologic Subareas. Similar to the Proposed Project, construction activities for this alternative could result in erosion leading to sediment-laden discharges to nearby water resources. Sediment transport could result in degradation to water quality. Similarly, fuels, oils, lubricants, and other hazardous substances

used during construction could be released and impact surface and groundwater. Following the completion of project construction, runoff from impervious surfaces could carry pollutants to drainages within the MHPA.

The release of sediment and other deleterious substances from the alternative site can be controlled through the use of appropriately selected erosion and sediment control devices, as required by the regulations similar to those that would be implemented for the Proposed Project.

Similar to the Proposed Project, peak storm water runoff rates would need to be calculated as part of the design and used to determine if existing drainage conveyance facilities would have the capacity and integrity to carry anticipated peak flows and volumes. The Proposed Project's significant impacts would be fully mitigated through the use of LID IMPs. Therefore, the alternative does not offer substantial benefits in terms of impact avoidance or reduction.

Transportation/Traffic: For the comparative analysis of transportation/traffic, VRPA assessed future LOS for the street network surrounding the alternative site, using future basic traffic volume forecasts for the year 2030 provided by SANDAG as part of its 2030 Regional Transportation Plan (VRPA 2007; refer to *Appendix D*). The EIR analysis indicates that the Proposed Project would result in traffic impacts that would be significant and not mitigated. No feasible mitigation measures have been identified in this EIR to reduce significant impacts to below a level of significance. These impacts would be avoided with implementation of the Camp Elliott Alternative.

Current access to the alternative site is limited to non-public dirt and paved roads associated with MCAS Miramar, as well as the access road located within the San Diego County Water Authority aqueduct easement. The interchange of SR-52 and Santo Road contains a potential point of public access, but its distance to the project site (approximately 1,800 feet southeast) dictates that a road extension would be required for access to the detention facility. The Navy is proposing to develop military housing on a site east of the project. A road would need to be constructed that could be utilized for access to the Camp Elliott site.

Implementation of the 1,216-bed project on the Camp Elliott Alternative site would add traffic to SR-52 and possibly Santo Road, a 4-lane major arterial. This alternative would result in substantially higher traffic volumes on surrounding roadways compared to the increase in traffic volumes resulting from the Proposed Project. This is due to the fact that the Proposed Project would result in a net increase of only 1,312 trips per day over volumes produced by the existing LCDF, while the alternative would involve construction of an entirely new 1,216-bed facility, which would result in over 2,590 ADT. However, this increase needs to be examined in the context of future operation of these surrounding roadways. Therefore, LOS conditions on the segments of SR-52 to the east and west of the Santo Road Interchange were studied for the year 2030. Future basic traffic volume forecasts for the year 2030 for various freeways and roadways

are provided by SANDAG. The network planned for 2030 is provided by SANDAG in the 2030 Regional Transportation Plan (SANDAG 2003) and shows SR-52 with six lanes and two additional managed lanes that function as reversible lanes during peak hour. For the purposes of determining the LOS conditions in the year 2030, the Regional Transportation Plan assumed ten lanes for SR-52. The average daily traffic forecasts for the two pertinent segments for the year 2030 are as follows:

- 2030 ADT on the segment of SR-52 west of Santo Road - 164,000
- 2030 ADT on the segment of SR-52 east of Santo Road - 142,000
- LOS on the segment of SR-52 west of Santo Road – D
- LOS on the segment of SR-52 east of Santo Road – C (VRPA 2007)

Given current and future (2030) operation conditions, implementation of the Camp Elliott Alternative is not anticipated to generate significant impacts to traffic. Implementation of this alternative would require development of an approximately 1,800-foot long access road that would result in additional impacts to biological resources, cultural resources, air quality, noise and hydrology. Therefore, while the alternative would avoid significant impacts of the Proposed Project (traffic), it would result in additional impacts in other issue areas.

Environmental Effects Found Not To Be Significant for the Proposed Project

As analyzed in *Chapter 3.0* of the EIR, the following effects for the Proposed Project were found to be not significant: aesthetics, agricultural resources, air quality, land use and planning, noise, mineral resources, population and housing, public services, and utilities and service systems. As summarized below, it is anticipated that implementation of the Camp Elliott Alternative would also not significantly impact these resources.

Aesthetics: Development on this alternative site would be visible from the County scenic highway SR-52 as listed in the County's Scenic Highway Element in the General Plan. Considering the surrounding vacant land uses and absence of sensitive viewers in close proximity to the site, the visual impacts that would result from the implementation of this alternative would not be significant. Because this site is undeveloped, the alternative would result in lighting impacts, even though lighting may be shielded. Therefore, impacts relative to aesthetics, including effects on scenic resources, visual character and light and glare, would be greater under this alternative. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Agriculture: Implementation of the Camp Elliott Alternative would not result in the loss of important agricultural lands (DOC 1998) and therefore the impacts to agriculture from

implementation of this alternative are not significant. This conclusion is similar to the less than significance conclusion reached for the Proposed Project, based on the analysis presented in *Section 3.1.2* of this EIR. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Air Quality: Implementation of the Camp Elliott Alternative would require development of a 45-acre site as well as generate daily trips during operation similar to the Proposed Project. Because the analysis of air quality impacts conducted for the project involved consideration of regional effects related to air quality standards, and because the alternative proposes the same facility within the same region, impacts that would result from the implementation of this alternative are anticipated to be substantially the same as those identified for the Proposed Project. Both the Proposed Project and the alternative would result in less than significant impacts on air quality. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Land Use and Planning: The site is surrounded by vacant land and military facilities that are part of the MCAS Miramar. Residential land uses are located immediately south of SR-52 from the alternative site. As with the Proposed Project, due to the existing arrangement of land uses surrounding the alternative site, implementation of the alternative in this location would not result in division of an established community. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Relative to land use, implementation of this alternative would result in potential conflicts with MCAS Miramar operations, because the site is surrounded by the military base. Potential operational conflicts could arise from access and security issues across military land. No other significant land use effects would be anticipated as a result of implementation of this alternative. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Noise: Construction and operational related noise generated by the proposed detention facility under this alternative would be similar to that under the Proposed Project. Noise impacts to sensitive human receptors at this site would be less than at the Proposed Project site, because development under this alternative would occur on vacant land that is surrounded by vacant lands, while development of the Proposed Project would occur in proximity to sensitive receptors (residences and schools). However, the Proposed Project would not result in significant noise impacts on sensitive receptors, therefore the alternative does not represent a substantial advantage in terms of impact reduction. Additionally, as noted in the discussion of biological resources, noise impacts from construction and operation on sensitive species would be greater with this alternative, but would possibly be mitigable. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Population and Housing: Similar to the Proposed Project, the alternative would be designed to meet the projected increase in the female inmate population, and this increase (and any associated increase in staff, etc.) would not foster economic or population growth, or the construction of additional housing. In addition, and similar to the Proposed Project, the alternative site does not contain any existing residential units or business uses and therefore, the alternative would not require the removal or relocation of any residential units or business uses. Therefore, neither the Proposed Project nor the alternative would result in significant impacts, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Public Services/Utilities and Service Systems:

Fire Protection: Implementation of the alternative would introduce a new land use at the alternative site and would create demand for fire protection services that does not currently exist. The alternative site would receive fire service from the City of San Diego Fire Department, with the closest fire station being Fire Station No. 39 located near the intersection of Tierrasanta Boulevard and Santo Road. It is likely that the City of San Diego would have the ability to maintain current service levels and acceptable service ratios with implementation of the alternative, similar to conditions anticipated with the Proposed Project. However, it is anticipated that similar to the Proposed Project, the alternative would have less than significant impacts on fire protection services. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Police Protection: The Camp Elliott alternative would receive security and law enforcement services by the City of San Diego's Police Department. The facility would be secured per state-mandated standards by SDSD. Similar to the Proposed Project, implementation of the alternative would not result in a significant impact to law enforcement facilities. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Schools: As with the Proposed Project, this alternative would not affect population growth and therefore would not result in a significant impact to school facilities or to existing schools. Therefore, neither the Proposed Project nor the Camp Elliott alternative would result in a significant impact to schools, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Parks: As with the proposed project, the Camp Elliott alternative would not increase the use of existing neighborhood or regional parks or other recreational facilities or require construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, neither the Proposed Project nor the alternative would result in a significant impact to parks or other recreational facilities, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Wastewater Treatment: There are no existing wastewater conveyance facilities available at the Camp Elliott site. New infrastructure would need to be extended to the site, and would likely be placed in roads that would need to be built to access the site. Wastewater from the alternative site would be treated by the City of San Diego Metropolitan Wastewater facilities. Since the alternative site lacks adequate infrastructure for wastewater conveyance, and construction of conveyance facilities could result in additional environmental effects, impacts from the alternative would be greater than the Proposed Project. However, it is likely that feasible mitigation would be available to reduce any such impacts to less than significant levels.

Water Facilities and Supply: Development of the project would result in increased demand for water, but the net demand increase at a regional level would be similar to the Proposed Project. Although the alternative site would be served by a different water purveyor (the City of San Diego), sources of water supplies would be similar in terms of reliance on imported water. It is anticipated that water supply availability for this alternative would be similar to that of the Proposed Project. Since the alternative site lacks adequate infrastructure for water conveyance, and construction of conveyance facilities could result in additional environmental effects, impacts from the alternative would be greater than the Proposed Project. However, it is likely that feasible mitigation would be available to reduce any such impacts to less than significant levels. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Solid Waste Capacity: Construction of the detention facility at the Camp Elliott site would still require the demolition of the existing LCDF. As with the Proposed Project, the majority of the material would be either recycled or reused. Operationally, the only difference in terms of solid waste disposal between the Proposed Project site and this alternative site would be that it is likely that the disposal facility that would service the site would be the Miramar Landfill. It is anticipated that there would be adequate capacity within the Miramar Landfill to accommodate the operational needs of the facility, and that, similar to the proposed Project, impacts would be less than significant.

4.2.4.3 Relationship to Project Objectives

The Camp Elliott Alternative would be able to meet project objectives 1, 2, and 3 by providing additional capacity to house female inmates. Specifically, the alternative would meet the following objectives: 1) correct the deficiencies at the existing LCDF by replacing old structures with modern facilities; 2) meet the projected needs of the County for women offenders to the year 2020 through the development of a 1,216-bed state-of-the-art multi-custody women's detention facility; and 3) build a women's detention facility in a location that facilitates the

transporting of arrested female offenders/inmates from throughout the County and the transporting of inmates to court facilities and other providers.

However, this alternative would not meet the County's objective 4 as it would inhibit implementation of SDSD's inmate management philosophy and visitation program. The closest public bus transportation available to Camp Elliott for use by visitors is from MTS Bus Route 20, which is located approximately 1 mile to the east of the alternative site. No other public transportation is available within the vicinity of the site.

The average number of visitors at LCDF is approximately 36 per day on weekdays and 96 per day on weekends. This number is anticipated to increase with the proposed project, due to additional programs and facilities to encourage increased visitations. Consequently, the proposed project would include a larger visitation center and an expanded visitation program. To implement the visitation program, it is important to maximize public transportation options at the new facility to encourage visitation. Visits with dependent children are especially important to SDSD's inmate management philosophy because they support the rehabilitation of women and reinforce the principles taught in parenting and life skills courses. For these reasons, project objective 4 would not be met with implementation of the Camp Elliott alternative.

4.2.5 Campo Alternative

4.2.5.1 Description and Setting

Construction of a new detention facility in the vicinity of the County's Juvenile Ranch Facility (JRF) in the community of Campo in eastern San Diego County was developed as an alternative in response to public scoping comments that requested review of sites next to existing juvenile facilities and in the rural eastern portions of the County. As shown in *Figures 4-1* and *Figure 4-6, Campo Alternative,* Campo is located along SR-94 in eastern San Diego County approximately 65 miles east of downtown San Diego. Campo is located in a valley bound by the U.S.-Mexico border to the south and undeveloped lands to the north, east and west. The County operates water supply and sewage treatment facilities that serve the JRF and the rest of the Campo community.

As shown in *Figure 4-6*, the County's Juvenile Ranch Facility (JRF) is located on Forest Gate Road and consists of a 280-acre site. The surrounding area is predominantly undeveloped with limited residential development. The JRF is operated by the County's Probation Department and is used to house juvenile boys aged 13 to 18 years.

Under this alternative, the existing LCDF in Santee would be closed and demolished and a new multi-custody women's detention facility capable of accommodating 1,216 female inmates would be built within the JRF property. Total site requirements under this alternative would be

approximately 45 acres (see *Figure 4).* This alternative site could accommodate the 45-acre requirement. The alternative site is vacant with onsite vegetation communities consisting of coastal sage scrub, chaparral, and native oaks. The site is located within the County's Mountain Empire Subregion. The site and surrounding area are characterized by hilly terrain with gradual slopes.

4.2.5.2 Comparison of the Effects of the Campo Alternative to the Proposed Project

Significant Environmental Effects of the Proposed Project

Cultural Resources*:* Camp Lockett is a County of San Diego Historic District. The boundaries of this district include the Campo Alternative site, but the 45-acre area selected for analysis does not include historic structures and does not contribute to the historic district. It is unknown whether the Campo Alternative site contains cultural resources. It is anticipated that any impacts to cultural resources at the Campo Alternative site would be mitigable, and therefore, impacts for this alternative would be less when compared to the Proposed Project due to avoidance of significant impacts on historical resources.

Biological Resources: To analyze the comparative impacts to biological resources, a review of SanGIS maps, aerial photographs, and the CNDDB database were used to research site conditions and evaluate potential impacts at this alternative site. These data sources were sufficient to provide an overall biological assessment for purposes of alternatives comparison. At the Campo Alternative site, the total area of ground disturbance for grading and construction would be 45 acres, similar to the impact area for the Proposed Project site. However, under this alternative, construction would occur at a new, undeveloped site dominated by vegetation communities consisting of dense chaparral and coastal sage scrub. Other sensitive biological resources with potential to occur onsite include a jurisdictional drainage channel, oak woodland vegetation communities, nesting/foraging habitat for birds and raptors, special status plant species (such as southern jewel flower), and special status wildlife species (such as quino checkerspot butterfly and coastal California gnatcatcher).

The proposed project would result in three areas of significant impacts to biological resources. The following is a comparison of the Campo Alternative site to each of those impact areas:

- The Proposed Project could result in direct impacts to nesting birds/raptors, and indirect noise impacts to offsite nesting birds due to construction noise. The Campo Alternative site supports several trees that could provide similar nesting potential for birds/raptors to the trees identified with nesting potential at the Proposed Project site. Therefore, potential impacts would also be similar. A review of aerial photography indicates that riparian vegetation exists on and adjacent to the Campo Alternative site. Therefore, the alternative site has the potential for direct and indirect impacts on noise sensitive riparian bird

species. Impacts on these species may be greater than with the Proposed Project given the known onsite habitat conditions for these species.

- The Proposed Project would result in direct impacts to sensitive natural communities (0.6 acre of disturbed coastal sage scrub, and 4.8 acres of non-native grassland), and to federal jurisdictional waters (0.04 acre of unvegetated waters). Development of the project on the Campo Alternative site has the potential to impact coastal sage scrub and a potentially jurisdictional drainage. Therefore, development at this site may impact sensitive biological resources to a greater degree than development at the Proposed Project site.
- The Proposed Project would have an impact related to a local tree protection Ordinance, due to removal of one coast live oak tree. Development at the alternative site would avoid this impact, however, the project impact is mitigated through replacement of the tree. Therefore, the Campo Alternative site does not offer a substantial advantage in terms of impact avoidance, since feasible measures to mitigate the stated project impact have been identified and would be implemented with the Proposed Project.

The Proposed Project site would not significantly affect special-status plant species. By comparison, the Campo Alternative site has the potential to support a number of special status plant species based on suitable habitat. The Campo site is undeveloped with existing dense chaparral and coastal sage scrub, as well as possibly oaks. Therefore, this alternative site would have greater potential to support sensitive plant species and impacts on these species may be greater than with the Proposed Project.

The vegetation communities present on the Campo Alternative site provide cover for wildlife movement, however the region has not been identified as a wildlife corridor. The Campo Alternative site is not located within a proposed preserve area of the MSCP. It is not anticipated that impacts to the Campo Alternative site, or the Proposed Project site, would be in conflict with local policies, ordinances, or adopted plans. In summary, impacts to biological resources would likely be greater under the Campo Alternative than would occur under the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Geology/Soils: Since the alternative site is marked by hilly terrain, more grading would be required at this site than at the Proposed Project site. Only site-specific geological evaluation and analysis could predict whether geologic hazards present significant constraints to development. However, based on grading requirements, geological and soil impacts of this alternative are anticipated to be greater than would occur under the Proposed Project. It is likely that these impacts would be mitigable to less than significant levels. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

No known mineral resources exist onsite (DOC 1982) and mining activities do not occur in the immediate vicinity. Therefore, impacts to mineral resources from the implementation of this

alternative are anticipated to be less than significant, and this alternative would not offer a substantial advantage in terms of impact avoidance.

***Hazards and Hazardous Materials**:* Risk of upset during construction and operation are expected to be similar to those identified for the Proposed Project, as materials used to operate the facility at either site, and demolition of the existing LCDF, would be similar. It is unknown whether existing hazardous materials exist onsite and therefore for purposes of the analysis conducted herein are assumed to be similar to those identified for the Proposed Project site. The EIR analysis indicates that potentially significant impacts to schools from possible risk of upset can be mitigated to less than significant. However, this impact would be similar with implementation of the Campo Alternative, as the closest school is located adjacent to the site at the Campo JRF. It is assumed that potentially significant hazards impacts could be mitigated to below a level of significance. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Hydrology and Water Quality: The alternative site is located in the Tijuana Hydrologic Unit of the California Water Quality Control Board's Region 9 – San Diego, within the Tijuana Valley Hydrologic Area. Similar to the Proposed Project, construction activities for this alternative could result in erosion leading to sediment-laden discharges to nearby water resources. Sediment transport could result in degradation to water quality. Similarly, fuels, oils, lubricants, and other hazardous substances used during construction could be released and impact surface and groundwater. Following the completion of project construction, runoff from impervious surfaces could carry pollutants to drainages both on and offsite.

The release of sediment and other deleterious substances from the project site can be controlled through the use of appropriately selected erosion and sediment control devices, as required by the regulations similar to those that would be implemented for the Proposed Project.

Similar to the Proposed Project, peak storm water runoff rates would need to be calculated as part of the design and used to determine if existing drainage conveyance facilities would have the capacity and integrity to carry anticipated peak flows and volumes. The Proposed Project's significant impacts would be fully mitigated through the use of LID IMPs. Therefore, the alternative does not offer substantial benefits in terms of impact avoidance or reduction.

Transportation/Traffic: The EIR analysis indicates that the Proposed Project would result in traffic impacts that would be significant and not mitigated. No feasible mitigation measures have been identified in this EIR to reduce significant impacts to below a level of significance. Thus, these impacts would be avoided with implementation of the Campo Alternative.

Access to the Campo site would be provided along Forrest Gate Road. Forrest Gate Road is a paved, two-lane road from SR-94 to Jeb Stewart Road. South of Jeb Stewart Road, Forrest Gate Road is an unpaved, dirt road. In order to provide adequate access, Forrest Gate Road would need to be paved and a driveway leading to the site would need to be constructed. SR-94 is a two-lane road from Northwoods Drive to Forrest Gate Road.

Implementation of the project on the Campo Alternative site would add traffic to Forrest Gate Road and possibly SR-94. This alternative would result in higher ADT when compared to the Proposed Project. The Proposed Project would result in a net increase of 1,312 trips per day over volumes produced by the existing LCDF, while the alternative would involve construction of an entirely new 1,216-bed facility. However, this increase needs to be examined in the context of future operation of these surrounding roadways.

Addition of traffic from the 1,216-bed facility would not substantially increase the volume of traffic expected in future conditions for Forrest Gate Road and SR-94; for both roadways, the alternative would likely not result in a change in level of service. Therefore, implementation of the Campo Alternative would not be anticipated to generate significant impacts to traffic, and would avoid significant impacts of the proposed project.

Environmental Effects Found Not To Be Significant for the Proposed Project

As analyzed in *Chapter 3.0* of the EIR, the following effects for the Proposed Project were found to be not significant: aesthetics, agricultural resources, land use and planning, noise, mineral resources, population and housing, public services and utilities and service systems. As summarized below, it is anticipated that implementation of the Campo Alternative would also not significantly impact these resources.

Aesthetics: The new facility constructed at this site would not be visible from SR-94 or other public view points and therefore the visual impacts from this alternative are not significant. The alternative would involve lighting that would be similar to the Proposed Project, but as with the project, it is anticipated that the lighting could be designed such that significant effects associated with light and glare could be avoided. However, because development of the facility in this location would be a new use, the net increase in lighting would be greater with this alternative. While the actual aesthetic appearance and context of the alternative are different from the Proposed Project, the impact conclusion relative to aesthetics, including effects on scenic resources, visual character and light and glare, would be similar. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Agriculture: Implementation of the Campo Alternative would not result in the loss of important agricultural lands (DOC 1998) and therefore, similar to the Proposed Project, the impacts to

agriculture from implementation of this alternative are not considered significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Air Quality: Implementation of the Campo Alternative would require development of a 45-acre site as well as generate daily trips during operation similar to the Proposed Project. However, development of the Campo site would require more grading, and operations would require increased driving time/distance to process inmates and therefore, air quality impacts that would result from the implementation of this alternative are anticipated to be greater than those identified for the Proposed Project, but would still be less than significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Land Use and Planning: The County's General Plan designates the Campo Alternative site as public/semi-public. The character of the surrounding area is predominantly open space. Conceptual plans for a proposed park within the overall Camp Lockett area identify the Campo Alternative site for equestrian facilities. Development of a detention facility at this location has the potential to conflict with planning efforts for this site and surrounding area. A proposed Camp Lockett Restoration Project to restore the Buffalo Soldiers' structures for use as a historic park is being considered. There is a proposal to transfer the Buffalo Soldiers buildings to the State for a State Park. A replacement Campo Detention Camp for juveniles is planned for this area. Implementation of the Campo Alternative may result in greater land use impacts than those resulting from the Proposed Project based on the possibility of land use conflicts. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Noise: Construction and operation-related noise under this alternative would be similar to the Proposed Project. Noise impacts to sensitive receptors at this site would also be similar to those at the Proposed Project site. Development under this alternative would occur on vacant land in close proximity to the County's existing JRF, while development of the Proposed Project would occur in close proximity to residences and schools. Therefore, noise impacts would be similar when compared to the Proposed Project, and the alternative does not represent a substantial advantage in terms of impact reduction. Also, as noted in the discussion of biological resources, noise impacts from construction and operation on sensitive species would be greater with this alternative, but would possibly be mitigable. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Population and Housing: Implementation of the Campo Alternative would not require the displacement of existing residences. Related population growth and demand for housing in eastern San Diego County would be greater than with the Proposed Project due to this alternative's location in the relatively remote Campo area, which would likely result in relocation of some of the existing employees. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Public Services/Utilities and Service Systems:

Fire Protection: Implementation of the Campo Alternative would introduce a new land use at the alternative site and would create a demand for fire protection services that does not currently exist. The alternative site would likely receive fire service from the San Diego Rural Fire Protection District, with the closest fire station being Fire Station 86, located in Campo on SR-94, and operated as a volunteer facility. It is likely that the Fire Protection District would have the ability to maintain current service levels and acceptable service with implementation of the alternative, similar to conditions anticipated with the Proposed Project. However, it is anticipated that similar to the Proposed Project, the alternative would have less than significant impacts on fire protection services. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Police Protection: The Campo Alternative would receive security and law enforcement services from SDSD, similar to the Proposed Project. The facility would be secured per state-mandated standards. Similar to the Proposed Project, implementation of the alternative would not result in a significant impact to law enforcement facilities. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Schools: This alternative may result in additional local population growth, as compared to the Proposed Project, due to the relatively remote location of the alternative site. However, it is not anticipated that the growth associated with the additional staffing would result in significant impacts. Therefore, neither the Proposed Project nor the Campo Alternative would result in a significant impact to schools, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Parks: As with the proposed project, the Campo Alternative would not increase the use of existing neighborhood or regional parks or other recreational facilities or require construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, neither the Proposed Project nor the alternative would result in a significant impact to parks or other recreational facilities, and this alternative does not offer a substantial advantage in terms of impact avoidance.

Wastewater Treatment: An existing wastewater treatment plant serves the JRF. The existing plant has no excess capacity to serve a potential new facility. Therefore, a new treatment plant would be required. In addition, sewage lines would need to be extended and expanded to serve this alternative. Extension of facilities may result in additional impacts to biological resources, cultural resources, air quality, and noise, but effects would likely be mitigable. With construction of a new treatment plant, impacts to wastewater systems would be less than significant, similar to

the Proposed Project. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Water Facilities and Supply: Development of the project would result in similar regional demand for water as the Proposed Project. There are existing water conveyance facilities related to the JRF that would likely need to be extended and expanded to serve this alternative. Extension of facilities may result in additional impacts to biological resources, cultural resources, air quality, and noise, but effects would likely be mitigable. Sources of water supplies would be different from the Proposed Project because the JPR is served by groundwater wells, rather than imported water. However, it is anticipated that sufficient groundwater supply would be available, and therefore, water supply impacts would be similar for the alternative as with the Proposed Project. Overall, impacts would be similar to the Proposed Project and less than significant. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

Solid Waste Capacity: Construction of a detention facility at the Campo Alternative site would still require the demolition of the existing LCDF. As with the Proposed Project, the majority of the material would be either recycled or reused. Operationally, solid waste disposal would be similar to the Proposed Project site, in that it would generate the same volume of waste, and would rely on regional disposal facilities. Therefore, this alternative does not offer a substantial advantage in terms of impact avoidance.

4.2.5.3 Relationship to Project Objectives

The Campo Alternative would be able to meet project objectives 1 and 2 by providing additional capacity to house female inmates. Specifically, the alternative would meet the following objectives: 1) correct the deficiencies at the existing LCDF by replacing old structures with modern facilities; 2) meet the projected needs of the County for women offenders to the year 2020 through the development of a 1,216-bed state-of-the-art multi-custody women's detention facility.

However, this alternative would not meet the County's objective 3. Specifically, under this alternative, a women's detention facility would not be built in a location that facilitates the transporting of arrested female offenders/inmates from throughout the County to the detention facility, court facilities, and other providers such as medical providers.

Constructing the facility at the Campo Alternative site would result in an operational inefficiency related to the booking process. In addition to housing inmates who have been sentenced, the existing LCDF also provides onsite booking facilities. As with the existing LCDF, the proposed LCDF project would include an onsite booking facility, which would continue to provide an operational benefit to SDSD staff, and other police officers and regional agencies in the central

part of San Diego County, including the regional agencies that currently use the existing LCDF to book arrestees (see *Section 1.1.3*).

With this alternative, officers transporting females arrested throughout the County would be required to drive to and from the Campo Alternative site for booking, court appearances, etc. Moving the booking facility to the Campo Alternative site would result in a net increase in the amount of time law enforcement officers would spend transporting female offenders and would correspondingly decrease the time these officers are available in their respective communities. The public safety needs of the County are best served when police officers and deputies spend more time patrolling the community and responding to calls for service and less time in transit to book persons taken into custody.

Also, medical providers are not in proximity to the Campo site. The closest facilities are Paradise Valley Hospital in National City, which is approximately 46 miles away, and Sharp Grossmont Hospital in La Mesa, which is approximately 49 miles away.

The Campo Alternative would not effectively meet project objective 4, since it would inhibit the implementation of the SDSD's inmate management philosophy and visitation program, which has the objective of reducing repeat offending and recidivism. The Campo Alternative does not provide convenient access to public transportation services. Public bus transportation is available in Campo from MTS (route 888), but would not provide convenient access from the project's service area since it does not provide direct access (closest stop is approximately 2.5 miles to the north) and operates Mondays and Fridays only. No other public transportation is available within the vicinity of the site. The average number of visitors currently (over a five week period in the summer of 2008) at LCDF is approximately 36 per day on weekdays and 96 per day on weekends. This number is anticipated to increase with the proposed project, due to additional programs and facilities to encourage increased visitations. Consequently, the proposed project would include a larger visitation center and an expanded visitation program. To implement the visitation program, it is important to maximize public transportation options at the new facility to encourage visitation. Visits with dependent children are especially important to SDSD's inmate management philosophy because they support the rehabilitation of women and reinforce the principles taught in parenting and life skills courses. For these reasons, the Campo Alternative would not meet project objective 4.

4.2.6 No Project Alternative

4.2.6.1 Description and Setting

CEQA requires an evaluation of the No Project Alternative in order for decision makers to compare the impacts of approving the project with the impacts of not approving the project. According to CEQA Guidelines (Section 15126.6[e]), the No Project Alternative must include:

(a) the assumption that conditions at the time of the Notice of Preparation (i.e., baseline environmental conditions) would not be changed since the Proposed Project would not be implemented, and (b) the events or actions that would be reasonably expected to occur in the foreseeable future if the project were not approved. The existing conditions are discussed in *Section 1.4* of this EIR and under each environmental topic as the "environmental baseline." The following describes the reasonably foreseeable actions or events that would occur if the project is not approved.

Under the No Project Alternative, as shown in *Figure 4-7*, the existing LCDF would stay in its same location and the surrounding land would likely be built out consistent with the City of Santee Town Center Specific Plan Amendment. Under the Specific Plan Amendment, the surrounding land uses would be built out with business park commercial/office uses (City of Santee 2006). Under the No Project Alternative, Cottonwood Avenue would remain as is and not be extended between Mission Gorge Road and future Riverway Parkway, because no right-of-way currently exists for this extension.

Under the No Project Alternative, the old structures and deficiencies at the existing LCDF would not be replaced with modern facilities or expanded to meet the County's projected needs for a multi-custody women's detention facility, thereby seriously threatening SDSD's ability to meet the urgent need to provide modern facilities that will reduce overcrowding and correct the deficient conditions at the existing LCDF.

4.2.6.2 Comparison of the Environmental Effects of the No Project Alternative to the Proposed Project

The environmental impacts of the No Project Alternative would primarily result from the operations of the existing LCDF and buildout of the business park commercial uses designated in the City of Santee's Town Center Specific Plan. Under the No Project Alternative, the potential impact to traffic would be greater due to increased vehicle trips associated with commercial development (i.e., approximately 200 trips per acre, or 9,000 ADT) over traffic generated by the Proposed Project (i.e., 1,312 ADT).

4.3 Identification of the Environmentally Superior Alternative

As shown in *Table 4-8*, each alternative evaluated in the EIR, when compared to the Proposed Project on an impact-by-impact basis, has a different combination of effects that avoid the impacts, or results in an impact similar to, greater than, or less than the Proposed Project.

The EIR analysis for the Proposed Project indicates that significant and unmitigated impacts to cultural resources and traffic would result from construction and operation of the Proposed

Project. The Otay Mesa, Camp Elliott and Campo alternatives would avoid the Proposed Project's significant traffic impacts (which would occur with or without the Proposed Project) and historical resource impacts.

In some cases, alternatives (as discussed in *Sections 4.1, 4.3, 4.4* and *4.5*), would create greater impacts to other environmental resources. For example, implementation of the Mid-rise Alternative would result in greater aesthetics impacts. The Camp Elliott Alternative would result in greater impacts to biological resources, geology/soils, as well as hazards. The Campo Alternative would result in greater impacts to biological resources, geology/soils and potentially land use. In comparison, as discussed in *Section 4.5*, significant impacts would generally be the same under the No Project Alternative, except that the No Project Alternative would cause an increase in traffic impacts from the traffic generated by commercial development of the area east of the existing LCDF.

Based on available data and the forgoing analysis, it appears that the Otay Mesa Alternative would be the environmentally superior alternative, based on reduction of impacts in cultural resources and traffic.

The Otay Mesa Alternative would avoid or substantially reduce significant environmental effects of the Proposed Project, and thus would be environmentally superior. The Otay Mesa Alternative would result in greater impacts to biological resources, but these are anticipated to be mitigable to less than significant levels.

Table 4-1
Las Colinas Detention Facility – Summary of Alternative Screening Analysis

Alternative	Project Objectives Criteria Met?				Feasibility Criteria Met?	Environmental Criteria Met?	*Considered in EIR?*
	PO#1	PO#2	PO#3	PO#4			
Alternative Site Plans							
1. New facility at same capacity on existing site	Yes	No	Yes	No	No	Yes	*No*
2. New maximum density/Low-profile detention facility (similar in bulk/scale to Proposed Project) on existing site	Yes (Partially)	Yes (Partially)	Yes (Partially)	No	No	Yes	*No*
3. Reduced development area - New multi-story mid-rise facility on 16-acre site	Yes	Yes	Yes	No	Likely	Yes	*Yes*
4. Reduced development area - New facility on 20-acre site	Yes	No	Yes	Yes	Likely	Yes	*Yes*
5. New development away from Magnolia 45-acre site – revised project	Yes	Yes	Yes	Yes	Yes	Yes	*Yes*
Alternative Locations – Increased and/or Expansion of Existing Detention/Facilities							
6. East Mesa Detention Facility – Otay Mesa	No	No	No	No	No	No	*No*
7.George Bailey Detention Facility – Otay Mesa	No	No	No	No	No	No	*No*
8. East Mesa Juvenile Detention Facility – Otay Mesa	No	No	No	No	No	No	*No*
9.R.J. Donovan Correctional Facility – Otay Mesa	No	No	No	No	No	No	*No*
10. CCA Facility – Otay Mesa	No	No	No	No	No	No	*No*
11.Proposed San Diego Correctional Facility – Otay Mesa	No	No	No	No	No	Potentially	*No*

Table 4-1 (Continued)
Las Colinas Detention Facility – Summary of Alternative Screening Analysis

Alternative	Project Objectives Criteria Met?				Feasibility Criteria Met?	Environmental Criteria Met?	*Considered in EIR?*
	PO#1	PO#2	PO#3	PO#4			
12.Utilization of available capacity and/or expansion at or near South Bay Detention Facility	No	No	No	No	No	No	*No*
13.Utilization of available capacity and/or expansion at or near Vista Detention Facility	Yes (Potentially)	Yes (Potentially)	No	Yes (Potentially)	Potentially	No	*No*
14.Utilization of available capacity and/or expansion at or near Descanso Detention Facility	No	No	No	No	No	No	*No*
15.Utilization of available capacity and/or expansion at or near San Diego Central Jail	No	No	Yes	No	No	No	*No*
Alternative Locations – New Sites Identified Through Public Scoping							
16.Development of new facility at Miramar Naval Air Station	No	No	No	No	No	No	*No*
17. Kearny Mesa	No	No	No	No	No	No	*No*
18. Spring Valley	Yes	Yes	Yes	Yes	Likely	No	*No*
19. Steele Canyon	Yes	Yes	No	Yes	Likely	No	*No*
20. Dehesa/Harbison Canyon	No	No	No	No	No	No	*No*
21. Camp Elliott	Yes	Yes	Yes	No	Likely	Yes	*Yes*
22. Fanita Ranch	No	No	No	No	No	No	*No*
23. Sycamore Canyon	No	No	No	No	No	No	*No*
24. Ramona	Yes	Yes	No	Yes	Likely	No	*No*
25. Pine Valley	No	No	No	No	No	No	*No*
26. Cuyamaca	No	No	No	No	No	No	*No*
27.Campo in the vicinity of the JRF	Yes	Yes	No	No	Likely	Yes	*Yes*
28. Borrego Springs	No	No	No	No	No	No	*No*
29. San Pasqual	Yes	Yes	No	Yes	Likely	No	*No*

Table 4-1 (Continued)
Las Colinas Detention Facility – Summary of Alternative Screening Analysis

Alternative	Project Objectives Criteria Met?				Feasibility Criteria Met?	Environmental Criteria Met?	*Considered in EIR?*
	PO#1	PO#2	PO#3	PO#4			
Alternatives Locations – New Sites Identified by Private Owners							
30. John Dillard Property – East Otay Mesa	No	No	No	No	No	No	*No*
31. Roesch Property – Santee	No	No	No	No	No	No	*No*
Alternatives Locations – New Sites Identified by the Department of General Services							
32. Hawano – East Otay Mesa	No	No	No	No	No	No	*No*
33. Rowland – East Otay Mesa	No	No	No	No	No	No	*No*
34. TPO LLC – East Otay Mesa	No	No	No	No	No	No	*No*
35. Otay Landfill – East Otay Mesa	No	No	No	No	No	No	*No*
36. Brown Field – East Otay Mesa	No	No	No	No	No	No	*No*
37. Rabago – East Otay Mesa	Yes	Yes	No	No	Yes	Yes	*Yes*
Adaptive Re-Use of Non-Detention Facilities							
38. Development of new facility at previous Naval Training Center – Point Loma, Scenario 1	No	No	No	No	No	No	*No*
39. Development of new facility at previous Naval Training Center – Point Loma, Scenario 2	No	No	No	No	No	No	*No*
40. El Cajon Speedway	No	No	No	No	No	No	*No*
No-Build Program Alternatives							
41. Interstate Transfer	No	No	No	No	No	Yes	*No*
42. Intrastate Transfer	No	No	No	No	No	Yes	*No*
43. Alternative Programs	No	No	No	No	No	Yes	*No*

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Table 4-2
Plant Communities and Land Covers

Plant Community / Land Cover	Acreage
Developed	1.1
Disturbed Land	2.7
Non-native Grassland	63.4
TOTAL	67.2

Table 4-3
Sensitive Wildlife Species Potentially Occurring In Project Area

Scientific Name / Common Name	Status (Federal/ State/ County)[1]	Habitat Preferences / Requirements	Verified On Site	Potential To Occur On Site
Ammodramus savannarum Grasshopper sparrow	None/ CSC/ Group 1	Restricted to native grassland	No	Moderate
Athene cunicularia Burrowing owl	BCC/CSC/ Group 1, MSCP	Grassland, lowland scrub, agriculture, coastal dunes and other artificial open areas	No	Moderate. Soils are friable and ground squirrel burrows are present.
Circus cyaneus hudsonius Northern harrier	None/ CSC/ Group 1, MSCP	Open wetlands (nesting), pasture, old fields, dry uplands, grasslands, rangelands, coastal sage scrub	No	Moderate for foraging; low potential to breed onsite
Eremophila alpestris actia California horned lark	None/ Watchlist/ Group 2	Open habitats, grassland, rangeland, shortgrass prairie, montane meadows, coastal plains, fallow grain fields	No	High

[1] CSC = California Special Concern Species
Watchlist = CDFG watchlist species
MSCP = MSCP covered species

Table 4-4
Project Trip Generation

Land Use	Size	Units	Daily Trip Generation	Daily Trips	% AM Peak	% PM Peak	% AM Inbound	% PM Inbound	AM Peak Hour Trips		PM Peak Hour Trips	
									In	Out	In	Out
Prison	1,216	beds	2.13	2,590	5.1%	6.6%	55%	54%	73	59	92	79
									Total AM Peak = 132		*Total PM Peak= 141*	

Source: VRPA 2008

Table 4-5
Summary of Intersection Impacts

Intersection	Existing				Existing + Project			
	AM		PM		AM		PM	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
Otay Mesa Rd/ La Media Rd	D	37.6	D	52.9	D	39.3	D	44.7
SR 905/ Airway Rd	D	42.9	D	41.6	D	42.6	D	42.0
Airway Rd/Sanyo Ave	A	8.5	A	8.1	A	9.3	A	8.8
Otay Mesa Rd/ Sanyo Ave	A	9.5	A	7.6	A	4.9	A	7.8

Source: VRPA 2008

Table 4-6
Summary of Roadway Segments Impacts

Route	Segment	Classification	Maximum two way ADT	Existing			Existing Plus Project		
				ADT	V/C	LOS	ADT	V/C	LOS
Otay Mesa Rd	Alta Rd – Sanyo Ave	Rural Collector	16,200	8,900	0.55	D	11,490	0.71	D
	SR125 – La Media Rd	6 Lane Major	50,000	32,600	0.65	C	34,413	0.69	C
	La Media Road – SR 905	6 Lane Major	50,000	31,700	0.63	C	33,513	0.67	C
Sanyo Ave	Otay Mesa Rd – Airway Rd	2 Lane Collector	15,000	2,000	0.133	A	4,590	0.31	A
Airway Rd	Sanyo Ave – SR 905	2 Lane Collector	15,000	9,000	0.6	C	11,590	0.77	D
SR 905	I-805 – Ocean Hills Pkwy	4 Lane Freeway	80,000	48,200	0.6	C	50,013	0.63	C
I-805	North of SR 905	8 Lane Freeway	150,000	115,000	0.77	C	116,813	0.78	C
SR 125	North of Otay Mesa Rd	4 Lane Toll Road	80,000	15,000	0.188	A	15,777	0.2	A

Source: VRPA 2008

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Table 4-7
Drive Time Comparison Between Santee and Otay Mesa

San Diego Police Department Division Station	Distance to LCDF 9000 Cottonwood, Santee, CA		Distance to an OM Alternative Otay Mesa and Alta Road *		SDPD Female Arrests by Division in 2007		
	minutes	miles	minutes	miles	Division	ARJIS Count	% of Total SDPD Arrests
Northern Division							
4275 Eastgate Mall,San Diego, CA 92037	21	17	38	33	Northern	690	12.2
Northeastern Division							
13396 Salmon River Road,San Diego, CA 92129	24	19	43	37	Northeastern	192	3.4
Northwestern Division							
12592 El Camino Real, San Diego, CA 92130	26	22	43	37	North City West	141	2.5
Eastern Division							
9225 Aero Drive, San Diego, CA 92123	18	12	32	26	Eastern	365	6.4
Southeastern Division							
7222 Skyline Drive, San Diego, CA 92114	20	13	21**	16**	Southeastern	535	9.4
Central Division							
2501 Imperial Avenue, San Diego, CA 92102	22	17	29	30	Central	1,458	25.7
Western Division							
5215 Gaines Street, San Diego, CA 92110	24	15	40	26	Western	818	14.4
Southern Division							
1120 27th Street, San Diego, CA 92154	29	24	14	10	Southern	259	4.6
Mid City Division							
4310 Landis Street, San Diego, CA 92105	22	13	28	21	Mid-City	1,193	21.0
					Unknown or Out of City	18	0.3
					Total	5,669	

Table 4-7 (Continued)
Drive Time Comparison Between Santee and Otay Mesa

**The intersection of Otay Mesa and Alta Roads is approximately 2,600 feet from the Rabago property (OM Alternative)*

***Assumes use of South Bay Expressway (SR125 toll road). Travel time/distance is 27 minutes/20 miles if South Bay Expressway is not used.*

Proportion of SDPD 2007 ARJIS Arrests closer to:

Las Colinas	**85.7%**
Otay Mesa Alternative	**4.6%**
Equidistant to the two locations	**9.4%**

Sources: www.sandiego.gov; MapQuest.com; Sheriff's Department Crime Analysis Unit

Table 4-8
Comparison of Proposed Project and Alternatives' Impacts

Issue Area	Proposed Project	Mid-rise Alternative	20-acre Alternative	Otay Mesa	Camp Elliott	Campo	No Project*
Significant Environmental Effects of the Proposed Project							
Cultural Resources	Significant and unmitigable.	Similar when compared to the Proposed Project since it would still result in significant unmitigable impacts to at least one historical building.	Similar when compared to the Proposed Project since it would still result in significant unmitigable impacts to at least one historical building.	Less than the Proposed Project since this alternative would not likely result in unmitigable impacts.	Less than the Proposed Project the Proposed Project since this alternative would not likely result in unmitigable impacts.	Less than the Proposed Project the Proposed Project since this alternative would not likely result in unmitigable impacts.	The same or similar as the Proposed Project.
Biological Resources	Less than significant with mitigation incorporated.	Less than the Proposed Project.	Less than the Proposed Project.	Greater than the Proposed Project due to the requirement to develop an undeveloped 45-acre site, and presence sensitive onsite vegetation communities.	Greater than the Proposed Project due to known sensitive resources onsite and impacts resulting from access road construction.	Greater than the Proposed Project due to undeveloped nature and resources present.	The same as the Proposed Project.
Geology/Soils	Less than significant with mitigation incorporated.	The same or similar as the Proposed Project.	The same or similar as the Proposed Project.	The same or similar as the Proposed Project.	Greater than the Proposed Project due to hilly terrain and potential for landslides.	Greater than the Proposed Project due to hilly terrain.	The same or similar as the Proposed Project.
Hazards and Hazardous Materials	Less than significant with mitigation incorporated.	The same or similar as the Proposed Project.	The same or similar as the Proposed Project.	Less than the Proposed Project due to lack of nearby sensitive receptors.	Greater than the Proposed Project due to ordnance hazard potential and nearby MCAS operations.	The same or similar as the Proposed Project.	The same or similar as the Proposed Project.

Table 4-8 (Continued)
Comparison of Proposed Project and Alternatives' Impacts

Issue Area	Proposed Project	Mid-rise Alternative	20-acre Alternative	Otay Mesa	Camp Elliott	Campo	No Project*
Hydrology and Water Quality	Less than significant with mitigation incorporated.	The same or similar as the Proposed Project.	The same or similar as the Proposed Project.	Less than the Proposed Project as the site is not within a 100-year floodplain.	Less than the Proposed Project as site is not within 100-year floodplain.	Less than the Proposed Project as the site is not within a 100-year floodplain.	The same or similar as the Proposed Project.
Transportation/Traffic	Significant; no feasible mitigation measures are available reduce impacts to less than significant l; therefore impacts are assumed to be unmitigated.	The same or similar as the Proposed Project.	The same or similar as the Proposed Project.	Less than the Proposed Project.	Less than the Proposed Project.	Less than the Proposed Project.	Greater than the Proposed Project due to increased vehicle trips associated with commercial development.

* Describes impacts under the assumption that if the Proposed Project is not approved, the LCDF would stay in its current location, and the surrounding land would be built out consistent with the City of Santee Town Center Specific Plan Amendment.

L E G E N D

- Indian Res.
- Military Res.
- U.S. Fish & Wildlife
- BLM
- MHPA
- State/County Parks & Reserve
- U.S. Forest Service
- Federal Wilderness Area
- CA Dept. of Fish & Game
- North County MSCP

ALTERNATIVE SITE PLAN

1 – 5 ALTERNATIVE SITE PLANS 1 - 5

EXISTING DETENTION FACILITIES

6 – 11 OTAY MESA DETENTION FACILITIES (6 Facilities)
12 SOUTH BAY DETENTION FACILITY
13 VISTA DETENTION FACILITY
14 DESCANSO DETENTION FACILITY
15 SAN DIEGO CENTRAL JAIL

NEW SITES

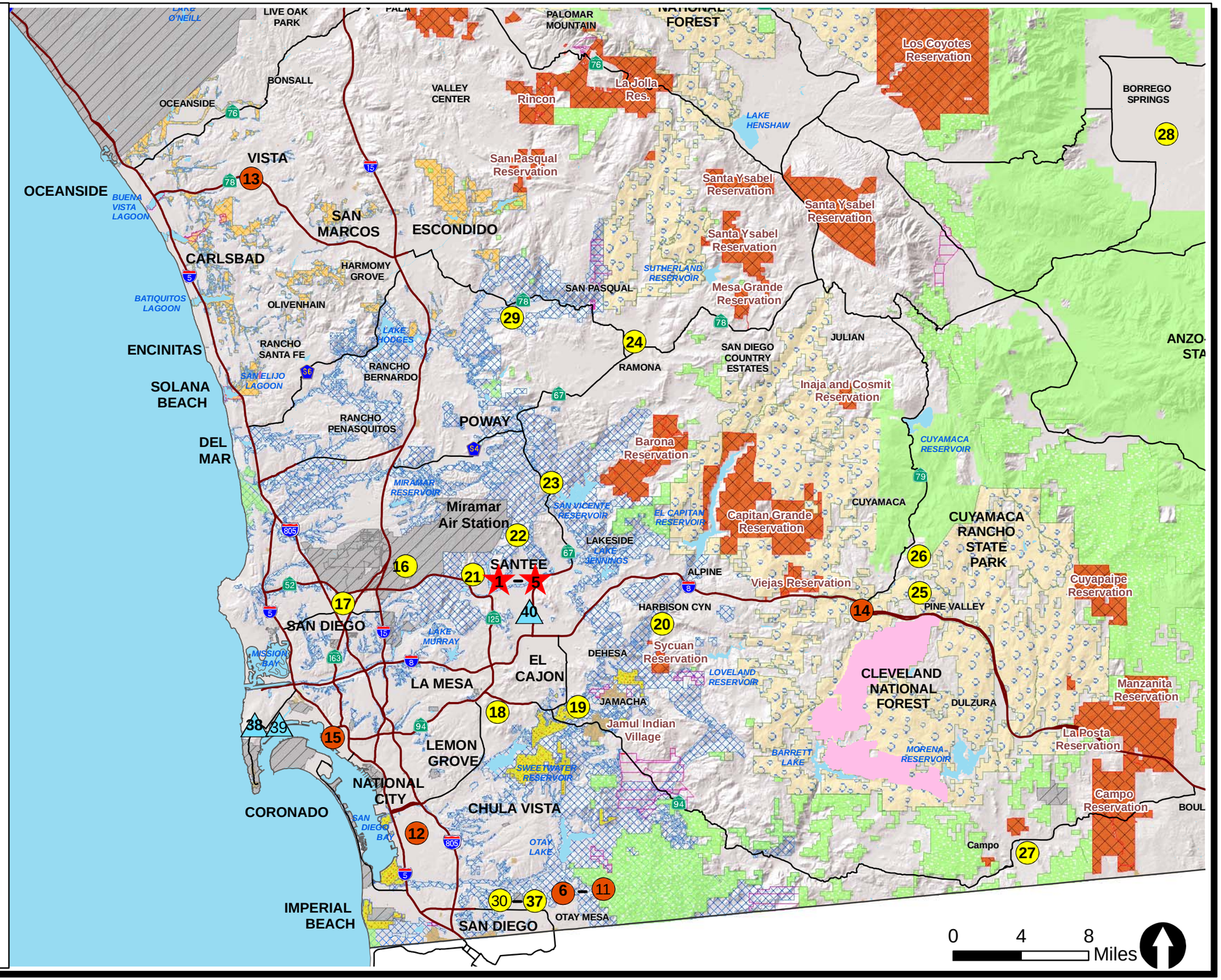
16 MIRAMAR AIR STATION
17 KEARNY MESA
18 SPRING VALLEY
19 STEELE CANYON
20 DEHESA / HARBISON CANYON
21 CAMP ELLIOTT
22 FANITA RANCH
23 SYCAMORE CANYON
24 RAMONA
25 PINE VALLEY
26 CUYAMACA
27 BOULEVARD / CAMPO
28 BORREGO SPRINGS
29 SAN PASQUAL
30 – 37 OTAY MESA (7 Sites)

ADAPTIVE RE-USE OF EXISTING FACILITIES

38 & 39 LIBERTY STATION (Previous Naval Training Ctr. Point Loma)
40 EL CAJON SPEEDWAY

NO BUILD ALTERNATIVES (Not Mapped)

41 INTERSTATE TRANSFER
42 INTRASTATE TRANSFER
43 ALTERNATIVE PROGRAMS



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Las Colinas

Alternatives Screening

FIGURE 4-1

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Las Colinas Detention Facility EIR

Mid-Rise Alternative

FIGURE
4-2

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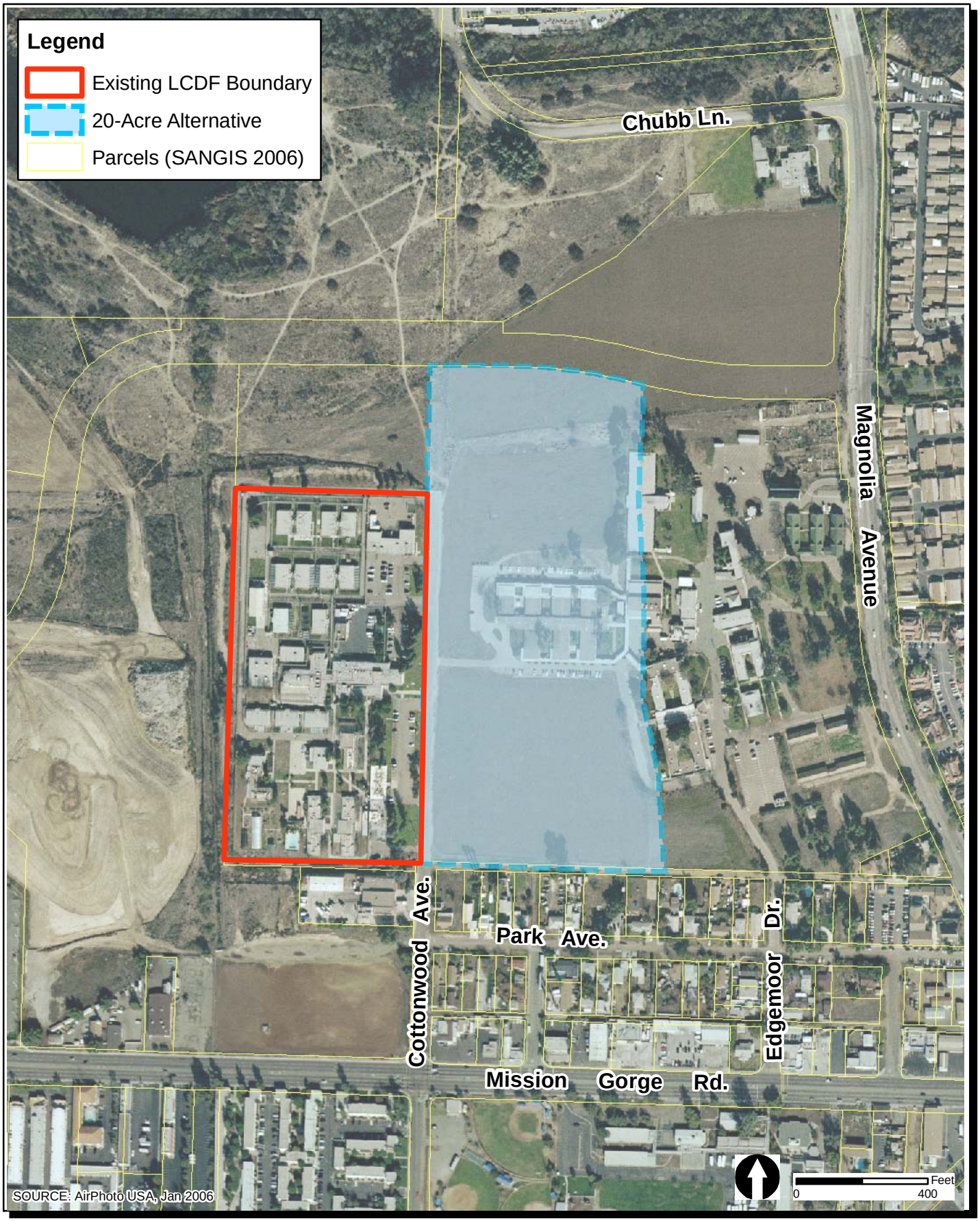

Las Colinas Detention Facility EIR

20-Acre Alternative

FIGURE
4-3

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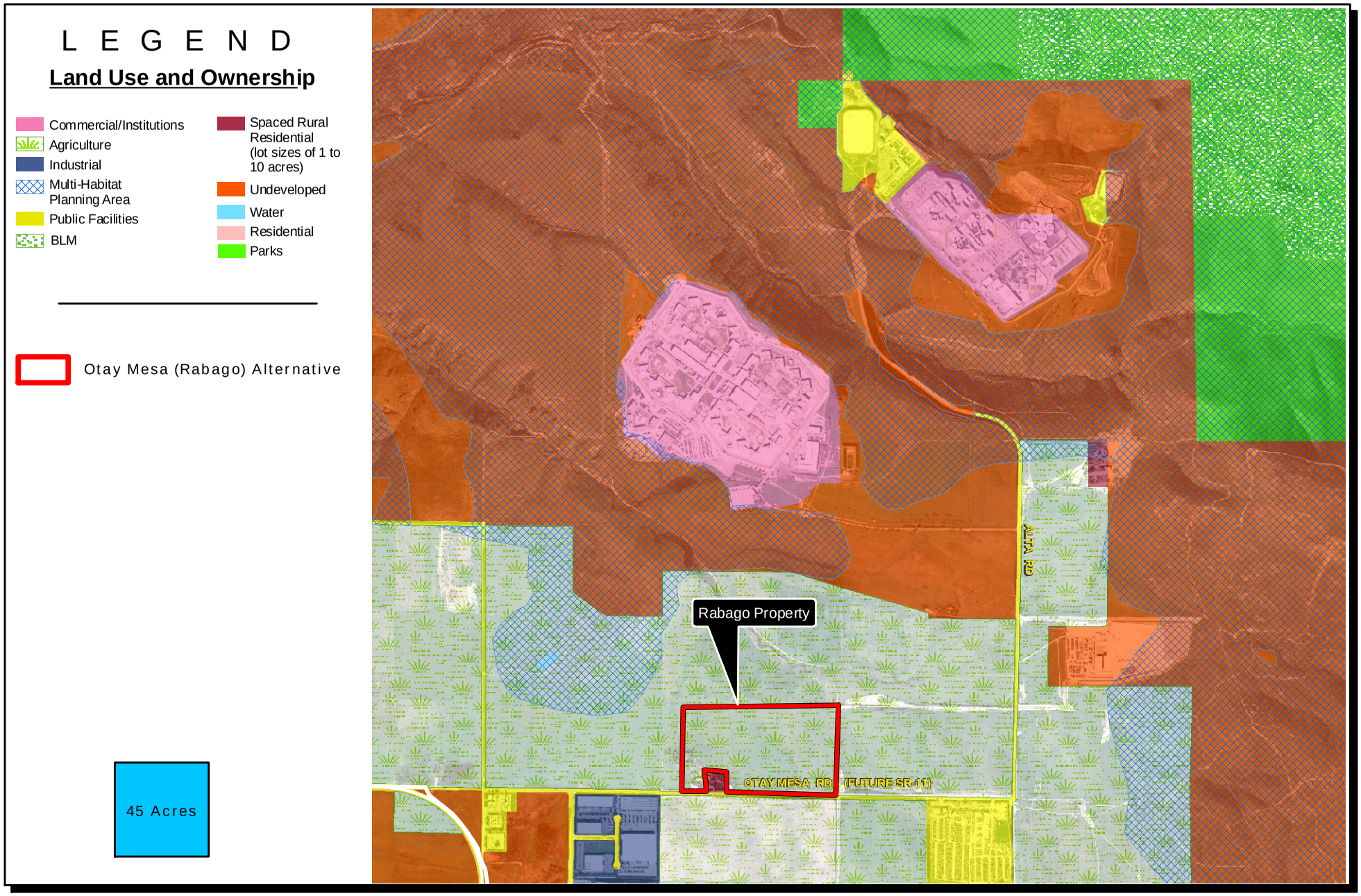

Las Colinas Detention Facility EIR

Otay Mesa (Rabago) Alternative

FIGURE 4-4

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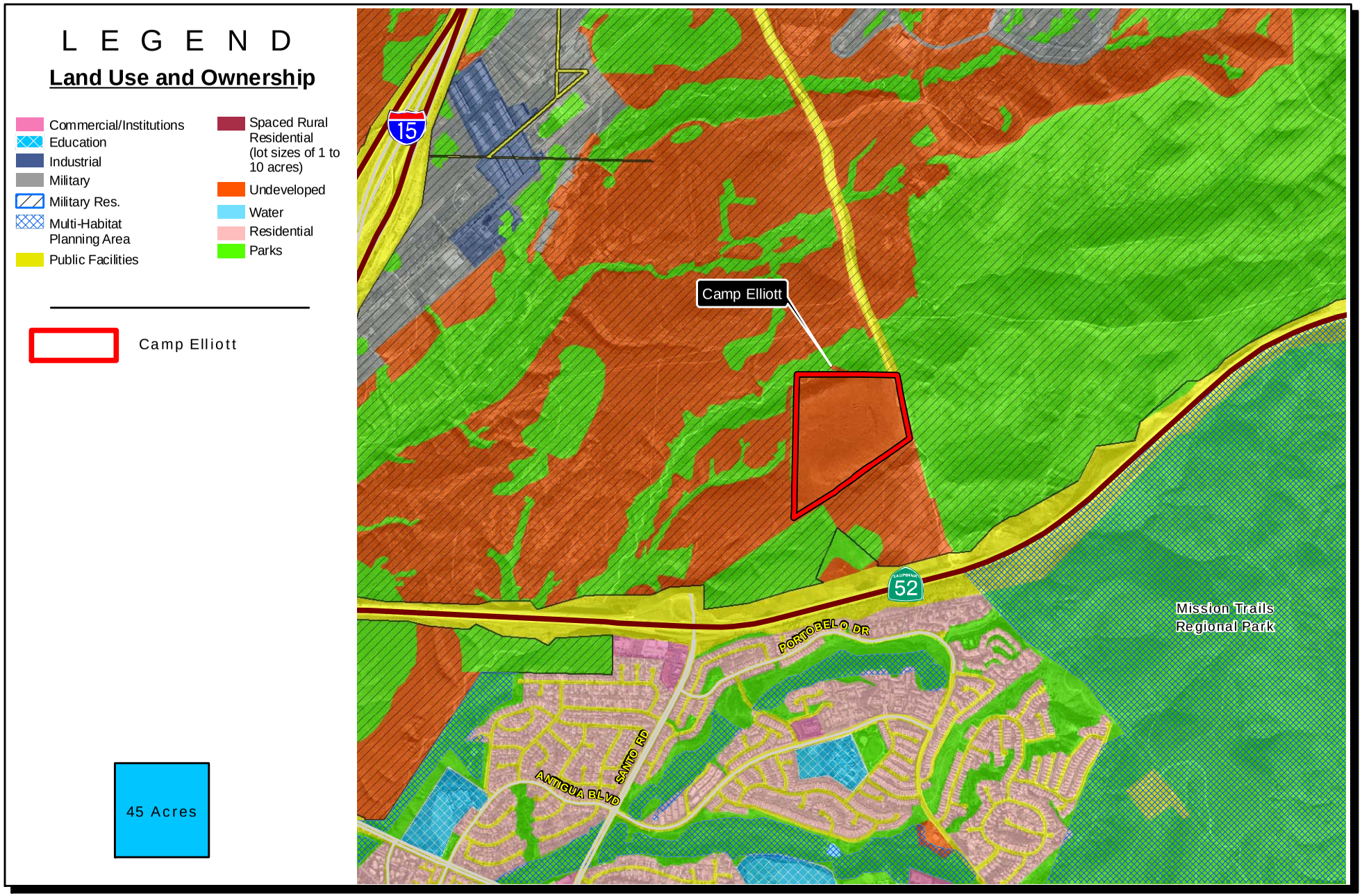

Las Colinas Detention Facility EIR

Camp Elliott

FIGURE 4-5

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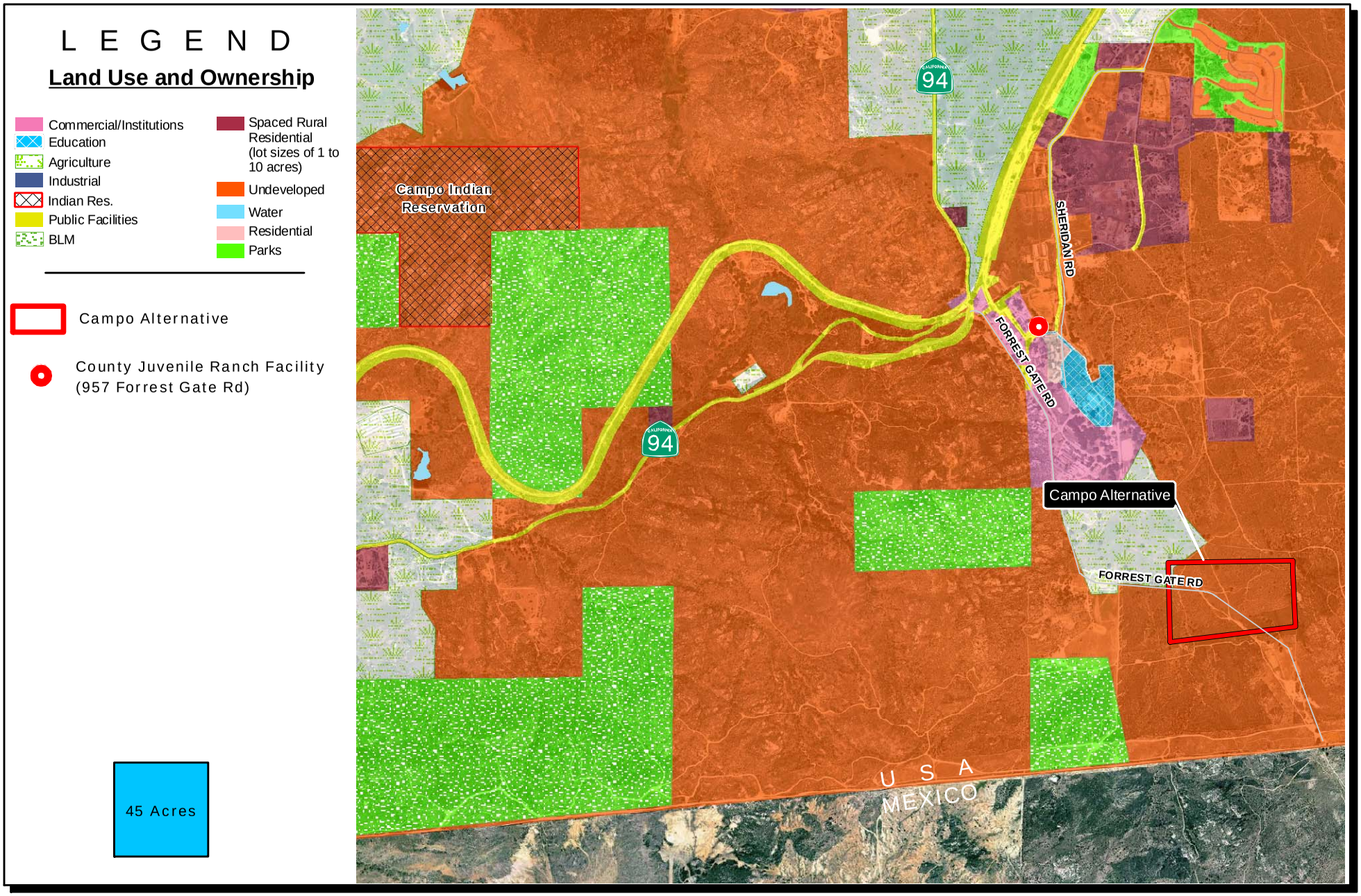

Las Colinas Detention Facility EIR

Campo Alternative

FIGURE 4-6

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Las Colinas Detention Facility EIR

No Project Alternative

FIGURE 4-7

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